



# THE HUMAN RIGHTS AND WORKING CONDITIONS POLICY

DOCUMENT ENDORSED BY

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## **1. Principles of Varesina Stampi S.p.a.**

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The purpose of this document is to promote respect for and protection of fundamental human rights, essential sustainability factors for Varesina Stampi S.p.a. (hereinafter referred to as "Varesina Stampi"), and it sets out reference principles and the commitments undertaken by the Company to protect and foster human rights in carrying out its business activities and in every context in which it operates.

Dignity and respect for people have always been at the heart of Varesina Stampi's corporate culture, which is constantly striving to ensure the elimination of any internal violations. Compliance with this Policy, based on the values of Varesina Stampi and its Code of Ethics, shall be considered an integral part of all employees' duties. It applies with immediate effect to Varesina Stampi and its direct and/or indirect subsidiaries in Italy and abroad.

Enhancing the value of work and respecting human rights are core elements of corporate culture and strategy at Varesina Stampi. For this reason, the Company has long since defined a Code of Ethics, made public not only to stakeholders but anyone who has an interest in reading it. This Policy defines how principles enshrined in the Code of Ethics are applied. Varesina Stampi is committed to significantly contribute to raising awareness on the importance of principles contained in this Policy.

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## **2. The commitment of Varesina Stampi S.p.a.**

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Varesina Stampi oversees application and compliance with the Human Rights Policy and the Code of Ethics within the Company and it expects all its Collaborators, - i.e. persons working with the Company on a contractual basis, even on an occasional and temporary basis, at all levels - and its Suppliers to comply with its rules, commitments and principles and to operate according to high ethical standards and in compliance with all applicable laws.

If a breach of the Human Rights Policy is detected internally or at a supplier, the reasons for the breach will be analysed and an alignment plan established.

This Policy reiterates the values and guidelines that shall inspire the choices and behaviour of all employees, regardless of their level, experience and role in the Company, whether working at the head office or in subsidiaries, in all the countries in which it operates.

Highly qualified staff and exacting process standards are key assets for corporate success: increased attention to human rights, especially in the workplace, proves that people are at the centre of every corporate process and every economic and business relationship.

Varesina Stampi therefore requests its Collaborators and Suppliers to commit to:

- Condemn all forms and types of child labour and not use or support child labour in any way;
- Condemn all forms of forced labour, not to resort to it and not to support it;
- Provide a safe workplace by adopting all appropriate measures to prevent accidents and injuries;

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- Respect workers' right of association and their freedom to join trade unions;
  - Avoid any form of discrimination based on gender, age, sexual orientation, religion, social origin or any other condition that might result in discrimination related to recruitment, remuneration, access to training, promotion or termination of employment;
  - Respect the employees' right to a decent wage by fulfilling their contracts and in any case guaranteeing a minimum living wage commensurate with the tasks performed;
  - Comply with the laws and industry agreements on working time, never exceeding the maximum allowable hours and guaranteeing scheduled rest and days off.

### **3. International reference framework**

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Varesina Stampi undertakes to respect and promote human rights, both through strict compliance with laws and regulations in countries where it operates and by adopting and enforcing its own internal Codes of Conduct and procedures.

The Human Rights and Working Conditions Policy is consistent with the following international treaties and European regulations and applies their basic principles:

1. The International Bill of Human Rights (United Nations);
2. The Universal Declaration of Human Rights;
3. The International Covenant on Civil and Political Rights;
4. The International Covenant on Economic, Social and Cultural Rights;
5. The Fundamental Principles of the International Labour Organisation (ILO) Declaration - Nos. 29, 87, 98, 100, 105, 111, 138, 182 - and the Declaration on Fundamental Principles and Rights at Work;
6. The United Nations Convention on the Rights of the Child;
7. The European Convention on Human Rights;
8. ILO Conventions No. 107 and 169 on the Rights of Indigenous and Tribal Peoples.

In addition, the most recent versions of the following trade regulations and voluntary initiatives have been considered:

1. The principles of the UN Global Compact;
2. The UN Guiding Principles on Business and Human Rights: Implementing the UN "Protect, Respect and Remedy" Framework;
3. The Guiding Principles for Sustainability in the Automotive Sector;
4. Modern Slavery Act of the United Kingdom 2015.

### **4. Internal reference framework**

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The following internal documents pertain to and support the principles stated in this Policy:

1. Code of Ethics of Varesina Stampi S.p.a.
2. Corporate Policy Statement of 15.12.2023 and subsequent amendments.
3. Whistleblowing Procedure to report wrongdoing and irregularities.

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## **5. Human resources protection**

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Human resources are a vital element for the existence and development of the company, which considers employees' and collaborators' professionalism and commitment as essential values to achieve its objectives.

Varesina Stampi respects and protects employees' and collaborators' dignity, health, safety and privacy by informing them of their rights and risks they may incur while performing their work duties upon hiring and following changes in corporate procedures.

More specifically, the Company safeguards employees' and collaborators' physical and moral integrity, ensuring respectful working conditions for the dignity of the individual, in compliance with current health and safety legislation.

Varesina Stampi shall ensure that no acts of violence or mental coercion, as well as any attitude or behaviour affecting individual dignity, are perpetrated.

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## **6. Freedom of association and collective bargaining**

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Varesina Stampi respects the freedom of association and the right to collective bargaining in compliance with local laws. Employees shall be free to join a trade union and negotiate their demands.

The Company shall grant employees the right of association in order to defend and promote their interests, as well as the right to be represented by trade unions or other forms of representation, in accordance with current legislation and practices prevailing in the various countries in which they are employed.

Collective bargaining is acknowledged as a privileged instrument to determine contractual rules and conditions for employees, as well as to regulate relations between the Company and trade unions. The Company shall ensure employees' representatives are in no way penalised or subjected to any form of retaliation.

Varesina Stampi undertakes to fully apply the Italian National Collective Labour Agreement governing its sector to every worker directly or indirectly employed.

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## **7. Remuneration and social security benefits**

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The Company considers that remuneration policies, benefits and working conditions shall guarantee an adequate standard of living to all workers, which is why at Varesina Stampi the employees' minimum wage is not lower than what set by collective agreements and regulations in force. In addition, the Company adopts an employee bonus system based on corporate performance and agreed with the social partners.

At Varesina Stampi, therefore, salaries are aligned with local laws applicable in the countries where the company operates and with market standards.

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## **8. Working hours**

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In performing its activities, Varesina Stampi complies with applicable laws on wages, working hours, overtime and compensation or, in the absence of specific laws, complies with international labour laws.

The Company promotes a fair work-life balance for employees, applying flexible workplace and working schedule strategies.

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## **9. Child labour/young workers**

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Varesina Stampi rejects any form of child labour and does not employ on its premises any person who has not reached legal age. Work-based learning experiences are guaranteed, in agreement with local educational institutions.

At all times, the Company shall verify that workers hired are never younger than the minimum age stipulated in ILO Convention No. 138 and shall ensure that young workers are protected from working conditions that pose a risk to their health, safety or development.

Additionally, the Company undertakes not to engage in or maintain labour relations with suppliers employing child labour.

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## **10. Modern slavery - forced or compulsory labour**

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Varesina Stampi refuses to engage in any kind of forced or compulsory labour (as defined by Convention No. 29 of the International Labour Organisation) and ensures working conditions in compliance with applicable laws and regulations.

Regular and overtime work is a voluntary expression of the workers' will and is free from any physical and/or psychological coercion.

The Company rejects all forms of slavery and human trafficking and does not confiscate money or ID documents for the purpose of holding workers against their will.

Varesina Stampi supports the global campaign against modern slavery and actively strives to counter it internally and within its supply chains.

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## **11. Impartiality and equal opportunities**

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Varesina Stampi promotes diversity, inclusion, equal treatment and equal opportunities and is committed to guaranteeing working conditions that respect the dignity of every person and to creating a working environment in which people are treated fairly and valued for their uniqueness.

The Company undertakes to protect each person's physical and psychological integrity and individuality and opposes any behaviour resulting in discrimination with regard to gender, age, disability, nationality, sexual orientation, ethnicity, religion, political opinions and any other form of individual diversity or any behaviour detrimental to the person, their beliefs or inclinations. Freedom of expression is likewise encouraged.

Physical, verbal, visual, psychological, discriminatory or sexual harassment resulting in a denigrating, hostile, humiliating, intimidating, offensive or unsafe workplace is not tolerated.

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Diversity is a strategic element enhancing the competitiveness of the Company and the growth of its employees. Varesina Stampi believes that having teams boasting different skills, experiences and backgrounds enriches the workplace and stimulates creativity, fostering a more effective leadership style and nurturing an increasingly open corporate culture.

For these reasons, Varesina Stampi undertakes to:

- Create an inclusive work environment providing respect, integrity, personal development and equal opportunities (e.g. training, growth, career), not only for current employees, but also for potential ones;
- Raise employees' awareness of diversity and equal opportunities within the Company;
  - Comply with equal opportunities standards and laws;
  - Foster employees' commitment to act respectfully and ethically in all relationships with colleagues, customers, suppliers and all parties they interact with;
  - Encourage suppliers to respect human dignity in terms of non-discrimination and protection of diversity.

## **12. Privacy**

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In pursuing its institutional aims, Varesina Stampi processes data concerning natural persons, whether employees, collaborators, visitors, customers, suppliers or any other person with whom it enters into relations. The Company, in accordance with its Code of Ethics, regards personal data protection as a top priority in its management and organisation. Accordingly, Varesina Stampi appreciates and adopts principles and rules protecting individuals by implementing appropriate technical and organisational procedures to respect their fundamental rights and freedoms, in particular that of personal data protection.

Besides, the Company ensures workers' dignity by respecting privacy in correspondence and interpersonal relations among employees, also forbidding the undue communication and/or dissemination of personal data without prior consent of the person concerned.

On a more general level, the Company observes confidentiality and privacy rights of stakeholders and is committed to the proper use of data and information provided by its employees, customers and other stakeholders.

Varesina Stampi also undertakes to supervise all third-party companies liable to use customers' personal data. To this end, specific clauses exist in contracts with partners using personal data to carry out targeted activities.

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### **13. Good practices for a safe and healthy environment**

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Varesina Stampi strives to ensure a positive and productive workplace for all employees, guaranteeing fair treatment and equal dignity and respect. Claims or threats aimed at inducing persons to act against the law, against the Human Rights Policy and against the Code of Ethics are not permitted; any behaviour endangering the safety of persons or property or being potentially violent shall be reported immediately.

Employees and collaborators shall behave in accordance with legality, loyalty, fairness, transparency and professionalism as expressed in our legislation, as well as in compliance with the rules of the Human Rights Policy and the Code of Ethics, with legal and contractual regulations governing working relations with the company and with company procedures.

Varesina Stampi undertakes to provide a healthy and safe workplace while respecting environmental protection and complying with all regulations regarding worker safety and the environment. Employees shall pay the utmost attention to hazard prevention in order to avoid accidents and personal injury; they shall observe health and safety regulations and practices relevant to their duties and adopt all necessary precautions to protect themselves and their co-workers.

Varesina Stampi considers the protection of fundamental human rights to be essential in any expression of social coexistence, starting with ensuring workers' health and safety in appropriate environments and conditions. Hence, the Company strives to ensure healthy and safe working conditions and to promote dissemination and consolidation of a safety culture among all workers, including within the supply chain.

All activities shall be planned and executed in order to preserve employees' health and safety and to ensure the highest standards in the field. Varesina Stampi performed a risk analysis regarding workers' health and safety: based on said risks, it undertakes to implement appropriate preventive measures and to provide workers with all appropriate protective equipment free of charge.

However, safety management is the responsibility of each employee who shall not, under any circumstances, endanger themselves or other colleagues in hazardous situations that could lead to injury or physical harm.

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### **14. Employee and collaborator selection**

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Staff recruitment is based on ensuring that the candidates' profiles match those expected and the needs of the Company, while complying with equal opportunities for all concerned. Information requested is strictly related to professional and psycho-aptitude profile verification, while respecting the candidate's privacy and opinions.

Insofar as information is available, Varesina Stampi takes appropriate measures to avoid favouritism, nepotism or forms of patronage during recruitment and hiring. When concluding contracts with employees and collaborators, the Company complies with applicable regulations and collective bargaining agreements in force.

The Company fosters ethical recruitment and therefore workers shall always be hired in a lawful manner, in accordance with national and international labour standards, fairly and transparently, respecting human rights.



As such, the Company undertakes not to mislead potential workers as to the nature of the job, not to ask workers to pay recruitment fees and/or confiscate, destroy, conceal and/or deny workers access to passports and other government-issued ID documents. Upon recruitment, workers receive a contract written in a language they understand and which truthfully and clearly sets out their rights and responsibilities.

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## **15. Training, career and employment stability**

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Varesina Stampi pledges to ensure that all workers, regardless of any discrimination, have the opportunity to improve their career according to their skills and talents. The Company endeavours to train its staff in order to enhance their skills, develop their talent and improve their working conditions by boosting their own satisfaction. The Company firmly believes in its role as guarantor of labour development and in the principle stated in Article 1 of the Italian Constitution: 'Italy is a Democratic Republic founded on labour.' For this reason, it agrees to limit the impact on workers of any economic crises potentially affecting the company, e.g. within corporate reorganisation processes, by implementing staff reduction procedures through redundancy plans and voluntary incentive redundancies for personnel close to meeting retirement requirements. The intention is to avoid layoffs. Should this not be possible, the Company offers responsible dismissal procedures and, in any case, strictly adheres to the regulations.

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## **16. Rights of minorities, indigenous peoples and local communities**

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Varesina Stampi undertakes to respect the rights of the communities in which it operates and to reduce social and environmental impact of its activities at production sites. It shall contribute to social and economic growth of communities and shall endeavour to behave respectfully towards the contexts of its location and to exert a positive influence on territories, through dialogue and cooperation with local authorities and civil society representatives.

The Company aims to build a strong cooperative relationship with its stakeholders, in order to create long-term value and opportunities for growth and development, as well as to promote open and transparent dialogue and relationships based on mutual trust.

It strives to continuously engage in an open dialogue with persons and bodies involved in human rights or labour rights issues in connection with its activities, where applicable, in order to focus on local problems and on easily solving them.

Individual conditions, economic and social development and general community welfare are closely linked: therefore, the Company pursues sustainable investment, respecting local and national communities in a way that promotes social inclusion.

Furthermore, Varesina Stampi endeavours to ensure that its products and services are designed to be accessible to all and to avoid compromising customers' health and physical integrity, as far as reasonably foreseeable.

The Company commits to respect local communities' rights and to contribute to their economic and social growth. Likewise, it collaborates with suppliers, contractors and partners committed to respecting Human Rights and contributing to the socio-economic development of the communities.

When planning and executing any infrastructure projects, the Company agrees to take into due consideration - as part of appropriate environmental and social impact assessments - its environmental footprint and compliance with Human Rights standards in the area where the project is planned.

Varesina Stampi devotes attention to the most vulnerable communities, such as indigenous and tribal communities, and is committed to the United Nations Declaration on the Rights of Indigenous Peoples.

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## **17. Using private or public security forces**

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Referring to the Voluntary Principles on Security and Human Rights, Varesina Stampi pledges to ensure that private security forces operating to protect the company's personnel and property in its areas of operation act consistently with applicable national laws and international rules and standards.

Should the Company employ private or public security forces to protect its business project or activity, it will monitor whether their deployment does not lead to human rights violations.

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## **18. Land, forest and water rights and eviction**

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In exercising its entrepreneurial activity, Varesina Stampi S.p.a. agrees to avoid, insofar as possible, forcible eviction and deprivation of land, forests, and water in the acquisition, development, or other use related to its business.

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## **19. Policy implementation and monitoring**

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This Policy on Labour Rights and Human Rights confirms the Company's commitment to its employees, suppliers, contractors and sub-contractors of all levels and partners, dealers and anyone who, in any way, is affected by the activities of the Company. This Policy shall be communicated to all interested parties, both internal and external, through appropriate communication initiatives.

The staff of Varesina Stampi shall, without exception, adapt their conduct to the principles set out in this Policy, both in the workplace and at external work-related events (meetings, social events, business trips).

Varesina Stampi requires its suppliers to comply with the Code of Ethics, the Company Policy and this Policy, which forbid forced labour and human trafficking and which require equal opportunities, health and safety in the workplace, as well as compliance with regulations on minimum wages, working conditions and working hours.

In compliance with the UN Guiding Principles on Business and Human Rights, Varesina Stampi will disseminate the contents of this Policy, including through awareness-raising and training actions, and will verify its effective implementation. To this end, specific periodic monitoring procedures will be established, in order to assess potential risk areas and optimise prevention and mitigation actions, with a view to continuous improvement of human rights protection.

## **20. Reporting violations**

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Human Rights reporting is handled in accordance with the Code of Ethics of Varesina Stampi, which provides a specific procedure on how to report violations.

If behaviour that does not comply with this Policy is suspected, it can be reported by means of:

an internal procedure as set out in the Varesina Stampi S.p.a. Whistleblowing Procedure concerning reports of offences and irregularities;

Address: Varesina Stampi S.p.a., Via G. Pozzi, n. 13, Sumirago (VA)

## **21. Policy review**

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This Policy will be periodically reviewed to ensure its effective implementation and adequacy, and will be adapted to any changes occurring in the external context.

The Board of Directors of Varesina Stampi S.p.a. will approve any revisions.