

**Somec S.p.A.**

## **Human Rights Policy**

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### **Registered office and company data**

Somec S.p.A.  
Via Palù, 30  
31020 San Vendemiano (TV)  
Italy  
Tel: +39 0438 4717  
Capitale Sociale Euro 6.900.000,00 i.v.  
C.F. e P.IVA IT 04245710266  
[www.somecgruppo.com](http://www.somecgruppo.com)

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## **1. PURPOSE OF THE POLICY**

The purpose of this policy is to provide guidance to SOMEK S.p.A. ("SOMEK") and its controlled and affiliate companies (all together "SOMEK Group") directors, officers, employees, agents, consultants, intermediaries, controlled joint ventures, and other third-party representatives to ensure compliance with applicable Human Rights Laws and regulation.

This policy applies to SOMEK, its subsidiaries, the entities in which it holds a majority interest, and the facilities that it manages. We are committed to working with and encouraging our business partners to uphold the principles in this Policy and to adopt similar policies within their businesses.

A violation of the applicable human rights regulation potentially subjects both SOMEK and the individual(s) involved to severe criminal and civil penalties. This policy contains principles of conduct that must be followed to comply with all relevant regulations.

## **2. SCOPE**

This policy applies as a minimum set of rules to all SOMEK Group companies.

Locally each company should adopt more stringent rules and procedures, as needed and in accordance with local laws and regulations.

While conducting its management and coordination activities, SOMEK S.p.A. respects management autonomy of each affiliate within its Group, while managing and controlling the overall business, as per legitimate interests of majority and minority shareholders, considering confidentiality requirements and local applicable laws.

## **3. OUR APPROACH TOWARDS RESPECT OF HUMAN RIGHTS**

Respect for human rights is fundamental to the sustainability of the SOMEK Group and the communities in which we operate. We are committed to ensuring that people are treated with dignity and respect.

Our activities are based on respect for global human rights, which are a non-negotiable fundamental value of our culture and corporate strategy. SOMEK Group works to manage and reduce the potential risk of human rights violations, to avoid causing - or contributing to causing - adverse impacts on these rights within the international, multiracial, socially and economically diverse conditions in which it operates.

We believe that business conduct cannot disregard ethics and the respect of human rights. We are committed to maintaining the highest possible ethical standards and to complying with all applicable laws in all countries in which we do business.

We firmly believe to have the responsibility to operate in compliance with the rules of the countries where we have a presence, distinguishing ourselves as an enterprise capable of exporting the values that permeate our actions, by promoting them in the communities where we operate.

We respect and protect the fundamental human rights laid down by the laws and regulations of each country where we operate. Our approach to human rights protection is inspired by international standards, including:

- the United Nations Declaration of Human Rights;
- the United Nations Convention on the Rights of the Child;
- the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, and the relevant applicable conventions;
- the European Convention on Human Rights.

#### **4. GENERAL PRINCIPLES**

As a general rule, our activities are based on respect for global human rights, which are a non-negotiable fundamental value of our culture and corporate strategy.

##### **4.1 Respect of Human Rights**

SOMEK Group respects human rights. It is committed to identify, prevent, and mitigate adverse human rights impacts resulting from (or caused by) our business activities; before or, if they occur, through appropriate mitigation processes.

##### **4.2 Valuing diversity / Non-discrimination**

SOMEK Group values the diversity of the people with whom we work and the contributions they make; and is opposed to any form of direct or indirect discrimination on the basis of gender, marital status, sexual orientation, religious or political beliefs, union membership, race, ethnicity, nationality, age, social background and status, physical and mental disability; and is committed to the prevention of discrimination in all areas of working life.

##### **4.3 Adequate working conditions**

SOMEK Group promotes a working environment based on trust, dialogue and mutual respect and protects the welfare and work-life balance of its employees, ensuring decent wages and fair working hours.

##### **4.4 Opposition to forced labor and Human Trafficking**

SOMEK Group opposes all forms of labor exploitation, including child labor, forced or compulsory labor and all forms of abuse or mental or physical coercion towards both their workers and workers employed along the supply chain, and strongly condemns all forms of human trafficking and exploitation.

##### **4.5 Work Hours, Wages and Benefits**

SOMEK Group compensates employees competitively relative to the industry and local labor market. We operate in full compliance with applicable wage, work hours, overtime, and employees' benefits laws.

##### **4.6 Child Labour**

SOMEK Group prohibits the hiring of individuals that are below the local age requirement.

##### **4.7 Safe and Healthy Workplaces**

SOMEK Group provides a safe and healthy workplace and complies with applicable safety and health laws, regulations and internal requirements (see also Health and Safety Policy on Corporate website). We consider the health and safety of workers a core value and proactively maintain a safe and healthy working environment by adopting high standards of prevention, assessment and management of related risks and by fostering and constantly spreading a corporate culture geared towards occupational health and safety.

##### **4.8 Workplace Security**

SOMEK Group is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided as needed and will be maintained with respect for employee privacy and dignity.

##### **4.9 Freedom of Association and Collective Bargaining**

SOMEK Group respects its employees' right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment and recognizes the right of its employees to form freely trade

unions and the right to collective bargaining and engages in open and constructive dialogue with representatives of recognized trade unions.

#### **4.10 Privacy**

SOMEK Group is aware of the importance of ensuring adequate safeguards to the interested parties concerned with the personal data processing operations and respects the right to privacy of all its Stakeholders, undertaking to use the data and information provided in a correct manner.

#### **4.11 Communities and Stakeholder Engagement / Local Communities**

SOMEK Group seeks to disseminate and promote its core business values, while respecting local cultures and indigenous people, protecting cultural and natural heritage and local traditions and customs. SOMEK contributes to the economic wellbeing and growth of the communities in which it operates by providing support to educational, cultural, and social initiatives for promoting personal development and improving living standards. SOMEK believes that dialogue with competent institutions is key to identifying the priority areas for local communities' support.

SOMEK Group is engaged in the identification, prevention and mitigation of human rights violation risks, promptly implementing corrective actions if these events occur.

SOMEK Group encourages:

- employees' awareness in conducting corporate activities with respect for human rights;
- in managing its supply chain in a responsible manner including the respect of human rights as one of its suppliers' selection criteria;
- its suppliers to deploy a similar management model.

SOMEK Group is open to cooperation with governmental, non-governmental and sectorial and academic bodies for the development of global policies and principles aimed at protecting human rights and informs its Stakeholders about the activities carried out and the performance achieved, primarily through the Group's annual Sustainability Report and the corporate website.

### **5. GRIEVANCE MECHANISMS**

SOMEK makes its Whistleblowing Channel available also for reporting any violations concerning human rights.

This reporting tool, which is suitable for ensuring the confidentiality of the source and information acquired, unless the law otherwise requires, is accessible on Corporate website to all its Stakeholders (<https://www.somecgruppo.com/en/internal-controls/Whistleblowing>) who can send communications at the following mail address [wbsomec@pec.net](mailto:wbsomec@pec.net).

SOMEK Group's Top Management has a strategic role in the full implementation of this Policy ensuring the involvement of all personnel and of those who collaborate with SOMEK Group and the consistency of their behavior with the values embodied in this Policy.

**SOMEK S.p.A.**  
Chairman

