



HUMAN RIGHTS PROTECTION POLICY

SARAS GROUP COMMITMENT

Protection and respect of Human Rights are fundamental principles that always inspired the operations of all companies within the Saras Group (hereinafter also referred to as "Group" or "Saras"), as expressed in the Code of Ethics and in dedicated corporate policies.

Carrying out its activities, the Group strives to protect the dignity and rights of the people it works with, to support the development of their knowledge and skills, and to recognize diversity as a resource. Moreover, it promotes the respect for these values along its goods and services supply chain and it contributes, directly and indirectly, to the well-being of the communities in which it operates.

With this Policy, Saras formally declares the founding values it draws inspiration from and the concrete actions it undertakes to protect Human Rights during its activities, which directly originate from the principles expressed in the following external and internal references.

External References

- Constitution of the Italian Republic
- UN Universal Declaration of Human Rights
- Fundamental conventions of the International Labour Organization (ILO)
- EU Regulation 679/2016 (GDPR - General Data Protection Regulation)
- UN Global Compact principles on human rights, labor, environment, and anti-corruption
- Guidelines of the Organization for Economic Cooperation & Development (OECD) for Multinational Enterprises
- UN Women's Empowerment Principles
- UN Sustainable Development Goals
- UN Convention against Corruption (UNCAC)

Internal References

- Saras Code of Ethics
- Saras Organization, Management and Control Model pursuant to Legislative Decree 231/2001
- Saras Corporate Statute
- Saras Group Policies (Sustainability, Our People, Integrity in Operations, Operational Excellence, Our Stakeholders, Safety and Information Management, Global Compliance, and Corporate Governance)
- Saras Group Companies' Policies on Health, Safety and Environment
- Saras Guidelines (Human Resources, Internal Control and Risk Management System, Anti-corruption, Fraud Prevention, Personal Data Protection, Sponsorship, and Generosity)

Work Practices

Regarding the respect and protection of Workers' Human Rights (child labor, forced labor, etc.), in addition to the principles and values expressed in this Policy, in the Code of Ethics, and in the Sustainability Policy, full assurance is also provided by the laws in force in the countries where the Saras Group operates - namely Italy, Spain, and Switzerland. Indeed, these laws abide with the principles outlined in the International Bill of Human Rights, in the OECD Guidelines for Multinational Enterprises, in the Fundamental Conventions of the International Labour Organization, and in the UN Guiding Principles on Business and Human Rights.

- **Refusal of Forced or Compulsory Labor and Child Labor**

Saras rejects any form of irregular, forced, brutal or compulsory labor, as well as any form of slavery and human trafficking - as defined by ILO Conventions No. 29 and No. 105. Furthermore, in compliance with the provisions of ILO Conventions No. 138 and No. 182, the Group refuses any form of child labor.

- **Respect for Diversity and Non-Discrimination**

The Group considers as fundamental the principles of respect for diversity, equal treatment and opportunities, and it is committed to protecting the right to working conditions that respect human dignity, as well as to creating an inclusive work environment where people are treated fairly and valued for their uniqueness. Saras respects the fundamental rights of individuals and ensures equal opportunities and inclusion, regardless of any sensory, cognitive, or motor disabilities, and without distinctions of race, gender, nationality, political opinion, sexual orientation, social status, age, or religious beliefs. As provided by ILO Convention No. 111, the Group promotes "equality of opportunity or treatment in employment or occupation" and is committed to eliminating any discrimination in carrying out its business activities.

- **Freedom of Association and Collective Bargaining**

Saras Group maintains an open, transparent, and continuous dialogue with trade unions in order to promote a constructive atmosphere of mutual responsibility. In compliance with ILO Convention No. 87, Saras protects employees' right to establish or join organizations aimed at defending and promoting their interests, and the right to be represented, within different production units, by trade union bodies or other forms of representation. Furthermore, as provided by ILO Convention No. 98, it encourages collective bargaining as a tool to determine the contractual conditions of employees and to regulate the relationship between the management and trade unions. The Group promotes the consultation of workers, also through social partners, in defining policies, processes and procedures aimed at improving the work environment and ensuring health and safety protection.

- **Health and Safety in the Workplace**

Saras has always promoted continuous improvement of its processes and transparent disclosure of its health and safety performance in the workplace. Each company within the Group, defining its own reference context and business segment, has adopted the Group's policies mentioned among the internal references of this document and has implemented adequate management systems certified according to the best international standards. Furthermore, in compliance with ILO Convention No. 155, it ensures safe working environments compliant with Health and Hygiene standards, and it promotes and disseminates a culture of safety. It protects its employees' right to life and health, third-party personnel, and local communities.

- **Fair and Favourable Working Conditions**

The Group promotes work-life balance through a flexible system of work activity management, based on responsibility and trust, and offers welfare services aimed at reconciling business sustainability with employee well-being. Additionally, it ensures fair and consistent remuneration systems commensurate with assigned responsibilities, compliant with current legislation, collective agreements, and sector standards, including benefits and working hours (ILO Conventions No. 1 and No. 30). It commits to ensuring gender pay parity for work of equal value, based on objective assessment of requested tasks (ILO Convention No. 100).

Community and Environment

In compliance with the UN Sustainable Development Guidelines, Saras adopts a development model in harmony with the environment, territory and affected communities, guided by principles of precaution, prevention, protection, respect for Human Rights, and continuous improvement. Therefore, the Group conducts its activities minimizing environmental footprint and considering, by developing its projects, the safeguarding of ecosystems, biodiversity, and local sociocultural traditions. It has also adopted and implemented Policies and Management Systems certified according to the best international standards, which it maintains effective over time, as well as designed and adopted specific technological interventions and efficiency measures.

- **Relationship with Stakeholder Communities and Respect for Their Rights**

The Group's commitment is constantly aimed at understanding, evaluating, and measuring the impacts in terms of Human Rights, socioeconomic development, environment and biodiversity, with reference to the communities in which the Group operates. More specifically, regarding these issues, the Group's

commitment is manifested through constant and participatory dialogue with stakeholders, and through the promotion of activities of preventive, free, and informed consultation, and actions of social inclusion. Furthermore, the Group implements targeted initiatives, such as:

- Promotion of workplace safety, environmental protection, and dissemination of corporate culture, through targeted training activities;
 - Promotion of social projects that generate value for the community, and support for the territory through donations and sponsorships;
 - Preference for local companies during the selection of goods and services suppliers, with equal requirements.
- **Prevention of Corruption and Fraud**
As stated in this Policy, in the Code of Ethics, in the Sustainability Policy, and in compliance with OECD Guidelines and the United Nations Convention against Corruption, Saras pays the utmost attention and commitment to compliance with laws, promotion of ethical and correct behaviors, and prevention of all forms of corruption. The Group has outlined the principles and rules to be followed to ensure such compliance within the Anti-Corruption and Fraud Prevention Compliance Guidelines.
 - **Respect for the Rights of Indigenous and Tribal Peoples**
The Group carries out its activities in Italy, Spain, and Switzerland, where there are no indigenous or tribal populations. However, in compliance with Article 3 of ILO Convention No. 169, it fully recognizes the human rights and fundamental freedoms of indigenous and tribal peoples and rejects any "form of force and coercion in violation of the Human Rights and fundamental freedoms of the peoples concerned".
 - **Human Rights in the Supply Chain**
Suppliers are essential partners for the achievement of the Group's sustainability targets. Saras relationship with its suppliers is based on respect, fairness, impartiality, and equal opportunities. Saras requires to its suppliers:
 - Compliance with laws;
 - Promotion of ethical and correct behaviors and prevention of corruption;
 - Respect for the values and principles outlined in the Code of Ethics, the Sustainability Policy, and in this Policy on Human Rights Protection.

Finally, in line with the company's "Know Your Counterpart" procedure for evaluating market counterparts, the Group does not engage in commercial relationships with counterparts listed in international "Black Lists," with operational presence or legal domicile in countries subject to embargo measures for the import/export of oil, petroleum products, or chartering activities, according to OFAC (United States of America), European Union Council (EU), or SECO (Switzerland) lists.

- **Privacy and Sensitive Data**
Saras Group has adopted a model for continuous improvement of the personal data protection system. In this context, Saras has identified and adopted adequate technical and organizational measures aimed at enhancing the protection of processed personal data, in accordance with the principle of accountability. The principles and rules to follow to identify roles and responsibilities and develop measures to fully comply with current regulations are outlined in the Personal Data Protection Compliance Guideline. In compliance with national legislation and EU Regulation 679/2016 (GDPR), personal data are processed respecting all fundamental rights and observing the freedoms and principles recognized by law, with particular attention to respecting private and family life, home, and communications, freedom of thought, conscience, and religion, freedom of expression, and information.

SCOPE, COMMUNICATION, IMPLEMENTATION, AND MONITORING:

The Policy for Human Rights Protection, publicly available on the corporate website (www.saras.it), applies to all Group Companies and is communicated both internally and externally to share corporate culture and to engage stakeholders.

Saras adopts a "Human Rights Due Diligence" process structured in five phases:

1. Public communication of the approach to respecting Human Rights, through this Policy and the Group's Sustainability Policy;

2. Identification and evaluation of current and potential negative impacts, also through stakeholder engagement;
3. Analysis of actions/initiatives undertaken to stop, prevent, mitigate, and remedy negative impacts;
4. Monitoring of the implementation of the above actions/initiatives, the results achieved, and related communication initiatives;
5. Establishment of specific complaint mechanisms, by which individuals and groups can express concerns about impacts and/or report potential irregularities or alleged violations, in Italy or abroad, by Group employees or third parties (so-called "Whistleblowing").

Regarding this last phase, the Group ensures that any complaints and reports are handled to protect the confidentiality and identity of the reporter, in compliance with legal obligations; whistleblowers acting in good faith are protected against any form of retaliation, discrimination, or penalization for reasons related, directly or indirectly, to the report.

UPDATING OF THIS POLICY

The Control, Risks, and Sustainability Committee periodically reviews the correct application of this Policy and the adequacy of its provisions, considering the evolution of best national and international practices, as well as applicable legal provisions, submitting any proposals for amendment or integration to the Board of Directors.