

SANLORENZO	INTERNAL POLICY	Policy code: P062025
Policy title: HUMAN RIGHTS POLICY		
Edition no: 1	Revision no: 0	Issue date: 17/12/2025
Page 1 of 6		

CONTENTS

1	GENERAL OBJECTIVE AND CONTENT.....	1
2	ADOPTION AND IMPLEMENTATION.....	2
3	SCOPE OF APPLICATION.....	2
4	PRINCIPLES OF THE POLICY	2
	4.1 Elimination of all forms of child, forced and compulsory labour	2
	4.2 Equal opportunity and elimination of all forms of discrimination	3
	4.3 Freedom of association and effective recognition of the right to collective bargaining	3
	4.4 Working conditions	3
	4.5 Workplace health and safety.....	4
	4.6 Protection of privacy	4
5	DISSEMINATION AND MONITORING.....	4
6	DEFINITIONS.....	5
7	VERSION HISTORY	6

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1 GENERAL OBJECTIVE AND CONTENT

With this Policy, the Sanlorenzo Group affirms its commitment to the protection of Human Rights, recognising their universal and inalienable value. The respect for dignity, freedom and equality of every person is a founding principle of the Group's corporate culture, as well as an essential condition for sustainable, responsible and inclusive growth.

This commitment is based on the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises.

SANLORENZO	INTERNAL POLICY	Policy code: P062025
Policy title: HUMAN RIGHTS POLICY		
Edition no: 1	Revision no: 0	Issue date: 17/12/2025
Page 2 of 6		

2 ADOPTION AND IMPLEMENTATION

The Policy is approved by the Board of Directors of the Parent Company Sanlorenzo S.p.A. and applies to all Group Companies.

Responsibility for its implementation is entrusted to the relevant departments within the various Group companies, which are called upon to ensure its effective application. To this end, they must actively promote the knowledge and sharing of the objectives of the Policy, integrating them into company processes and daily activities.

The Sanlorenzo Group is also committed to guaranteeing access to confidential, independent and easily accessible reporting mechanisms, so that all stakeholders can report possible violations of Human Rights in a safe and transparent way. Reports may be transmitted through the dedicated whistleblowing channel of Sanlorenzo S.p.A., accessible at the following link by all stakeholders: [Whistleblowing - Corporate Governance - Sanlorenzo Spa.](#)

3 SCOPE OF APPLICATION

This Policy applies to all companies belonging to the Sanlorenzo Group, as well as to all subjects operating within them or on their behalf, but not limited to:

- All employees, collaborators and directors of Sanlorenzo Group companies;
- All suppliers, business partners and other stakeholders operating on behalf of the Group or with whom the Group has significant relations.

The Sanlorenzo Group is committed to promoting the dissemination of and respect for this Policy throughout the value chain, encouraging a responsible and respectful approach to Human Rights in every sphere of activity. To this end, it reserves the right to terminate relations with third parties who adopt behaviour that does not comply with the principles set out in this Policy, unless appropriate corrective action is taken.

4 PRINCIPLES OF THE POLICY

The following paragraphs explain and expand upon the fundamental principles serving as the basis of the Human Rights Policy.

4.1 Elimination of all forms of child, forced and compulsory labour

SANLORENZO	INTERNAL POLICY	Policy code: P062025	
Policy title: HUMAN RIGHTS POLICY			
Edition no: 1	Revision no: 0	Issue date: 17/12/2025	Page 3 of 6

The Sanlorenzo Group rejects all forms of forced, compulsory or not voluntary labour, as well as any condition involving exploitation or deprivation of personal freedom. The use of child labour is also forbidden, in full compliance with the regulations in force in the Countries in which it operates and the Conventions of the International Labour Organisation (ILO).

Similarly, the Sanlorenzo Group strongly condemns all forms of modern slavery and human trafficking.

All employment relationships established by the Sanlorenzo Group must be based on the free will and informed consent of the worker, guaranteeing full respect for human dignity, fundamental rights and individual freedoms.

4.2 Equal opportunity and elimination of all forms of discrimination

The Group is committed to eliminating all forms of discrimination. Discrimination based on ethnicity, skin colour, language, gender, sexual orientation, religion, political opinions or any other personal or social condition shall not be tolerated under any circumstances.

The Sanlorenzo Group actively promotes an inclusive culture that values all diversity as a source of wealth and guarantees equal opportunities for all employees. Every stage of the employment relationship - from selection and recruitment to the training, professional growth and remuneration of employees - is based on criteria of merit and competence.

4.3 Freedom of association and effective recognition of the right to collective bargaining

The Sanlorenzo Group recognises and protects the fundamental right of workers to freedom of association and collective bargaining, in full compliance with national regulations and those in force in the Countries where it operates.

The Group guarantees all employees the full freedom to join trade unions or other forms of representation, without any pressure or form of discrimination. Furthermore, the Group is committed to establishing an open, constructive and transparent dialogue with its employees and workers' representatives, aimed at promoting fair working conditions and reaching shared solutions.

4.4 Working conditions

SANLORENZO	INTERNAL POLICY	Policy code: P062025	
Policy title: HUMAN RIGHTS POLICY			
Edition no: 1	Revision no: 0	Issue date: 17/12/2025	Page 4 of 6

The Sanlorenzo Group is committed to ensuring fair working conditions that respect the dignity of every person, guaranteeing all direct and indirect workers regular and contractually protected employment.

Remuneration is defined according to criteria of fairness and adequacy, in compliance with the standards set by the regulations in force in the Countries where the Group operates. Working hours are also defined in compliance with legal provisions, guaranteeing a healthy balance between professional and private life.

4.5 Workplace health and safety

The Group recognises the right to a healthy and safe working environment for all external workers, including indirect workers along the value chain, promoting working conditions that prevent accidents, occupational diseases and risks to health, in line with applicable international standards and legislation in force in the Countries where the Group operates.

With reference to its employees, the Group's commitment to health and safety in the workplace is regulated in detail within the Group's Human Resources Management Policy.

The Sanlorenzo Group requires its partners and suppliers to adopt effective preventive measures and adequate training programmes to guarantee the protection of health and safety at work.

4.6 Protection of privacy

The Sanlorenzo Group recognises the right to privacy and the protection of personal and sensitive data as an integral part of the respect for fundamental Human Rights. To this end, it is committed to ensuring that personal data and confidential information relating to employees, collaborators, customers, suppliers and other stakeholders are processed lawfully, correctly and transparently, in compliance with applicable national and international regulations.

5 DISSEMINATION AND MONITORING

This Human Rights Policy is made available to all Group personnel through internal communication channels, including through Sanlorenzo S.p.A.'s corporate intranet.

It is also published on the corporate website of Sanlorenzo S.p.A., for accessibility to all external stakeholders, including customers, suppliers, business partners, local communities and competent authorities.

SANLORENZO	INTERNAL POLICY	Policy code: P062025
Policy title: HUMAN RIGHTS POLICY		
Edition no: 1	Revision no: 0	Issue date: 17/12/2025
Page 5 of 6		

The Group is committed to fostering full understanding of the Policy through awareness-raising initiatives and training activities aimed at personnel. It also promotes the dissemination of the principles contained in the document externally, encouraging behaviour aligned with these values by employees, partners and suppliers.

The Group undertakes to monitor, at its primary suppliers, the correct and effective application of the principles set out in this Policy, in line with the provisions of the Code of Ethics of the individual companies, where present.

6 DEFINITIONS

<u>United Nations Guiding Principles on Business and Human Rights</u>	Set of 31 principles adopted by the United Nations Human Rights Council, 16 June 2011. Based on the Protect-Respect-Remedy framework, they provide the first global standard for preventing and addressing human rights risks in business.
<u>International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work</u>	Declaration adopted by the International Labour Organisation, June 1998 (revised 2010, updated 2022), recognising four fundamental rights binding on all member states, even if these have not ratified the corresponding conventions. The rights are: Freedom of association and collective bargaining; Elimination of forced labour; Abolition of child labour; Non-discrimination in employment.
<u>Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises</u>	Voluntary instrument issued by the OECD, updated in 2023, consisting of recommendations jointly addressed by governments to multinational enterprises, covering areas of human rights, labour law, environment, anti-corruption, consumer treatment, innovation and taxation. Associated with this are National Contact Points (NCPs), aimed at promoting implementation.

SANLORENZO	INTERNAL POLICY	Policy code: P062025
Policy title: HUMAN RIGHTS POLICY		
Edition no: 1	Revision no: 0	Issue date: 17/12/2025
Page 6 of 6		

7 VERSION HISTORY

Version	Issue date	Description
V1	17/12/2025	Initial version