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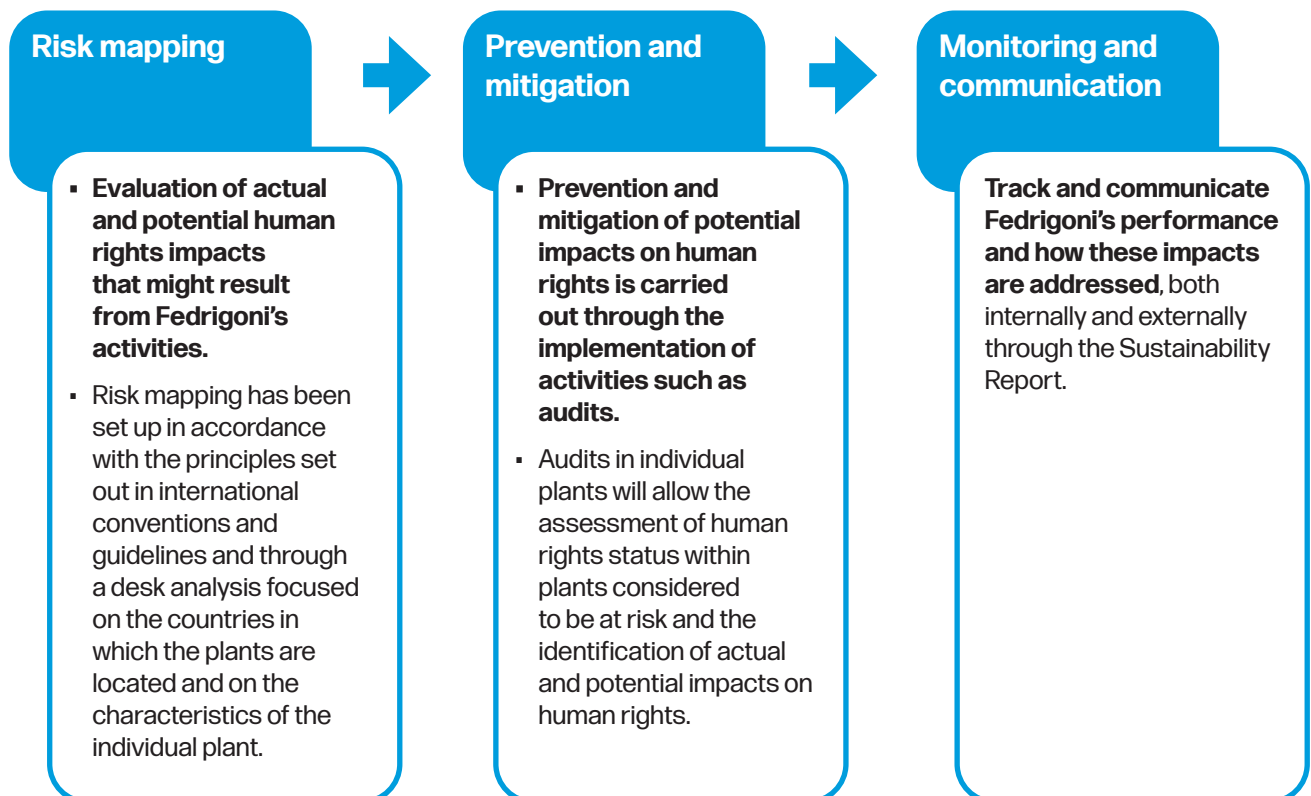
Fedrigoni Human Rights Impact Assessment



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In 2022, Fedrigoni carried out a human rights assessment to verify the level of human rights protection in the Group's production plants. This assessment, which is part of a broader due diligence process, aimed at proactively identifying and evaluating the potential impacts and risks related to the respect of human rights that may occur at the Group's plants.

The due diligence process will be implemented according to the following steps, defined by the United Nations *Guiding Principles on Human Rights* (UNGPs):



To date, Fedrigoni has conducted an initial risk mapping on 100% of its production sites. The list of human rights considered in this first analysis includes: forced and child labor, modern slavery and human trafficking, discrimination, freedom of association and collective bargaining, occupational health and safety, working conditions and hours, remuneration, vocational training, privacy, right to disconnect, impacts on biodiversity and the local community. Given that many of the human rights in question are linked to workers' rights, particular attention has been paid to employees and seasonal workers. In addition, other vulnerable groups have been considered, including: women, children, people with disabilities and local communities.



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The risk mapping process consisted of three phases:

- 1. Definition of a human rights questionnaire:** through a desk analysis activity on reference documentation, legislative frameworks and country risk, a questionnaire has been established with human rights and related subjects to be investigated for the reality in which Fedrigoni operates;
- 2. Analysis phase:** documents, data and information were collected at the central level and questionnaires were sent to the relevant people in the plants analyzed;
- 3. Processing of results:** the results have been aggregated and revised to identify plants that present, theoretically, potential risks of violations of the human rights analyzed. As a result of this phase, possible remedial or improvement actions will be considered, if necessary.

This analysis on individual plants has been cross-referenced with the risk analysis at the level of the individual country in which Fedrigoni operates, with particular attention to the national and international regulatory framework and how it is implemented with respect to this framework. The definition of a total risk, by aggregating the country risk with that of the individual plant, offered the possibility to define on which of Fedrigoni's plants to evaluate an in-depth analysis. The analysis revealed no human rights violations in the plants analyzed. However, in some plants, which account for 21% of the total employees of the Group, potential points of improvement emerged to further protect certain issues. Many of the plants in this category are new acquisitions, which still have to fully transpose the guidance, measures and assets implemented at Group level.

In the coming months, Fedrigoni intends to move on to the next phase: prevention and mitigation. These additional steps will allow to investigate the results of the first phase and to identify any mitigation measures that are in place or to be implemented. Following this analysis, further investigation will be considered for some plants and the definition of a possible improvement plan will be considered. Moreover, as the company is very committed to the sustainability of its suppliers, it considers the management of human rights risks along the entire supply chain a constant priority and, therefore, a due diligence process will be adopted to assess the respect of human rights by suppliers.

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