

### Good practices for respect at the workplace

#### #PEOPLE

#### I - INTRODUCTION

##### Purpose of the document

A safe, participatory and professional work environment, free of all forms of discrimination and harassment, where every individual feels important, respected and protected is, for the Fedrigoni Group, a pillar of its identity.

It is for this reason, with the Global Policy '**Good practices for respect**', inspired by the Group's Code of Ethics, that we wish to create a culture of inclusion, equity and diversity, collaboration and good conduct between colleagues, by codifying some instructions that can aid people in preventing inappropriate, disrespectful conduct or one that can be misunderstood.

The purpose of this Policy is also to prevent discrimination and harassment, which may or may not represent examples of crime, by ensuring adequate protection of the persons involved through a reporting process that protects privacy in compliance with the law and does not rule out any resort to other forms of true legal protection.

##### Legislative context and scope of application

The Group complies - and requires that its employees do the same - with the applicable national and international laws and standards. Nevertheless, if the Group standards and expectations are more restrictive than those provided for by the legislation in some countries, the Fedrigoni Group requires its employees to abide by the standards in this Policy in order to ensure consistent compliance with the principles of the Code of Ethics and the safeguard of a fair and equal work environment.

The "Good practices for respect" apply to the employees of the Fedrigoni Group and all circumstances where work activities are carried out in company or "third party" places, by way of example but not limited to:

- all the Fedrigoni Group work premises;
- during all assignments outside headquarters (e.g. in customers' offices);
- during work-related trips, conferences or training sessions;

In all circumstances where an individual represents the Fedrigoni Group or could reasonably appear as a representative of the Fedrigoni Group.

#### II - GENERAL PRINCIPLES AND GROUP COMMITMENT

The Fedrigoni Group promotes a diverse and inclusive workplace based on equity, the principles of good manners and the mutual respect between people.

It considers discriminatory conduct and harassment in any form unacceptable: mobbing, stalking, pressure and intimidation, abuse of power, insults, bullying, even when carried out via digital tools and channels.

When carrying out their work activity, employees are personally involved in creating and maintaining a respectful and harmonious work environment, using appropriate language and removing intimidatory, hostile, degrading, humiliating or offensive words and conduct.

Employees must contribute to guaranteeing the respect for rights and the value and dignity of the person in all work relations and maintaining a work environment where discrimination and harassment are considered unacceptable. In no circumstance must an incident be ignored or made light of; every incident must be reviewed by following the appropriate company channels. Both the HR Team and the Group Compliance Officer and Chief Internal Auditor are available to all employees to offer support on the discrimination and harassment issues.

These principles are fully consistent with the policies and values already outlined in the Fedrigoni Group Code of Ethics, which, on this issue, states the following:

*"7.6 - Harassment and discrimination in the workplace*



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*The Group prohibits, in both internal and external working relationships, any form of intimidation, threat, verbal or physical offence or conduct or requests for personal favours that could compromise the smooth and normal performance of one's work. Any person who, while performing his/her activity on behalf or in favour of the Group, considers him/herself to be a subject of harassment or discrimination for any reason, may report the event to the Director of the company's HR Department or to his/her superior, without affecting the right to protection from any form of retaliation regarding the person filing the complaint".*

The Fedrigoni Group therefore undertakes to deal with and resolve accusations of discrimination and harassment in a quick, confidential and effective manner.

## **Unacceptable conduct**

- The word "**discrimination**" means unjust treatment or treatment that is prejudicial to different classes of people based on, by way of example but not limited to: race, religious belief, colour of the skin, sex, gender identity, physical condition, mental condition, age, family, place of origin, source of income and sexual orientation.

- The word "**harassment**" means any conduct that:

- denies the dignity and respect of the individual;
- creates or contributes to an intimidatory, hostile or offensive work environment;
- interferes with the work performance of an individual;
- negatively influences the relationship of an employee with the Company or his/her colleagues.

Harassment can arise in many ways: both through verbal and physical or digital conduct and through comments, intimidation, ridiculing, verbal or physical abuse, threats, blackmail, contemptuous comments, banter, allusions, insults or jokes.

In particular, we consider the following disrespectful: conduct of a sexual or gender nature that negatively influences, or threatens to negatively influence, directly or indirectly, a person's psychological wellbeing, a person's work conditions, and the safety of the job or the prospects of promotion or earnings.

With reference to this context, the following, by way of example but not limited to, are prohibited:

- unwelcome sexual advances, request for sexual favours and/or other verbal or physical conduct of a sexual nature;
- threats of reprisal, explicit or implicit;
- coercive sexual conduct to control or influence the career, salary or performance assessment of another employee;
- unreasonable interference with work performances or creation of an offensive, intimidatory or hostile work environment.

The conduct constitutes harassment regardless of the intent.

## **III - REPORTING PROCEDURE IN THE EVENT OF DISCRIMINATION OR HARASSMENT**

1. In the event of discrimination or harassment, the employee must follow the whistle-blowing procedure provided for by the Fedrigoni Group's Code of Ethics, and in particular:

- Report the event, by using alternatively, based on the circumstances, the following channels:
- his/her manager;
- the Human Resources team;
- the email box: [codeofethics@fedrigoni.com](mailto:codeofethics@fedrigoni.com)

2. Document the events as fully as possible, showing the date, time, places, possible witnesses and facts.

The competent functions undertake to check every single report with the same care and attention and under the maximum confidentiality, not make light of and not discriminate in turn on the basis of the persons involved.

## **IV - MANAGEMENT OF REPORTS**

When the report is received, the competent functions initiate a confidential check to ascertain the event.

The people involved in the event and anyone that can provide relevant information regarding the circumstances can be interviewed in the context of this check. All the information collected during the interview process will be treated confidentially. Following the check, the competent functions will take measures regarding the positions of the persons involved. If necessary, the disciplinary system be put into action on the basis of current legislation and the company regulations and this may entail disciplinary sanctions commensurate with the seriousness of the cases, including dismissal.

In any case, the protection of the whistle-blower in good faith is guaranteed.

The entire management of the report will be documented through emails, documents and minutes of any meetings.



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## **V - REPORTING**

The competent functions inform the Board of Directors of the reports regarding the Global Policy “Good practices for respect” annually in all the Group sessions.

This information on the cases examined is given by describing the activities carried out and reference period anonymously.

