

FEDRIGONI

Human Rights Policy

Respecting human rights and ensuring a safe, healthy, just and equitable working environment throughout the business are at the heart of Fedrigoni. Our commitment is to act in accordance with the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

This policy reflects the values expressed in our **People & Nature Commitment**, the **Group Code of Ethics**, and the **Supplier Code of Conduct**, and applies to all our employees, sites, business units, suppliers, contractors and business partners worldwide.

Our principles

We treat every person with dignity, fairness and respect. We are committed to ensuring working conditions that support well-being, personal development and equal opportunities. We expect every individual connected to Fedrigoni, whether an employee, a supplier, or a business partner, to uphold these standards in their own sphere of responsibility.

Our Zero-Tolerance Standards

Fedrigoni strictly prohibits:

- Any form of forced work, coercion, intimidation or human trafficking
- The involvement of minors in any form of labour that is prohibited by law or inconsistent with their safety, development or education.
- Discrimination based on personal characteristics, identity, beliefs or social conditions
- Any restriction on freedom of association or collective bargaining
- Harassment, abuse, threats or conduct that undermines personal dignity or safety

These principles are embedded in our Code of Ethics and binding for anyone acting on behalf of Fedrigoni.

Fair Working Conditions

We are committed to fostering a workplace where people can thrive. In line with our internal policies and our **Labour rights and employment practices policy**:

- We ensure wage practices that comply with legal requirements and internal standards aimed at fair and adequate compensation.
- Working hours must protect health and allow for a balanced personal and professional life, including appropriate compensation or rest for overtime.
- Paid leave and rest periods are guaranteed in accordance with local regulations.
- We provide additional welfare and social protection measures, beyond statutory requirements, tailored to local contexts.

These commitments guide both our internal practices and the expectations we set for our supply chain.

FEDRIGONI
Fedrigoni SpA

Registered office
Piazzale Lodi 3
20137 Milano, Italy
T +39 02 55308151

Operating office
Via Enrico Fermi 13/f
37135 Verona (VR), Italy
T +39 045 8087888
F +39 045 8009015

Share capital
€ 40.000.220 i.v.
VAT number
VAT Code IT Business register
Milano Monza Brianza Lodi
n. 01664630223

fedrigoni.com

Directing and
controlling by
Fiber JVCo S.p.A.



FEDRIGONI

Suppliers and Business Partners

Suppliers, contractors, intermediaries and partners are required to comply with the labour and human rights principles outlined in the **Fedrigoni Supplier Code of Conduct**. This includes:

- Prohibiting forced and child labour
- Ensuring safe and decent working conditions
- Respecting freedom of association and non-discrimination
- Managing working hours and wages responsibly

Compliance is monitored through risk assessments, audits and corrective action plans when needed.

Putting Our Commitment into Practice

Fedrigoni implements its human rights approach through:

- Regular assessments of labour and human rights risks across operations and the value chain
- Monitoring of key indicators such as working hours, wages, equal treatment, safety and well-being
- Training and awareness initiatives to ensure that employees and relevant partners understand their responsibilities
- Structured dialogue with worker representatives and other relevant stakeholders
- Providing confidential grievance channels are accessible to all
- Clear remediation processes to address potential or actual impacts

Governance and Oversight

The **Board of Directors** oversees this commitment, supported by the **ESG Committee** and relevant Group functions.

Our human rights approach is reviewed regularly to ensure alignment with evolving expectations, legal requirements and the needs of our people and communities.

Transparency and Reporting

We aim to provide all our stakeholders with clear and transparent information and results of our performances. Our annual Sustainability Statement is written in accordance with externally recognized frameworks and includes our targets and results. The Human Rights Policy is publicly available on our website and communicated to all internal and external stakeholders.

Approved by the Board of Directors of Fedrigoni S.p.A. on April 21, 2026

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