

FEDRIGONI

Labour rights and employment practices policy

Introduction

At Fedrigoni we are committed to respecting and promoting fundamental human rights and fair labour practices, in alignment with the principles of the UN Global Compact and the fundamental conventions of the ILO (International Labour Organization).

Scope

The Labour Rights and employment practices policy (the “Policy”) defines our mandatory commitments regarding labour rights. Its scope of application covers:

- Own Operations: All direct employees of the Fedrigoni Group globally.
- Contractors: Workers employed by third parties providing services at our sites or on our behalf.
- Partners: Suppliers and business partners involved in our value chain.

Policy commitments

To ensure a fair, safe, and respectful working environment, Fedrigoni subscribes to the following specific commitments:

1. Living Wage Fedrigoni recognizes that the legal minimum wage may not always be sufficient to guarantee a decent standard of living. Therefore, we are committed to paying all employees a **living wage**.

- We define a *living wage* as remuneration that meets or exceeds the minimum required to cover the basic needs of the worker and their family (food, housing, healthcare, education, transport), excluding bonuses and overtime.
- We regularly monitor our pay levels against local cost-of-living benchmarks to ensure this standard is met.

2. Working Hours and Overtime We are committed to ensuring a healthy work-life balance and preventing excessive workloads.

- **Maximum working hours:** We strictly comply with national laws and ILO standards regarding weekly and daily working hour limits.
- **Overtime:** Overtime work is always voluntary, must not be requested on a regular basis, and must be compensated with premium pay or compensatory rest, in accordance with local laws and collective agreements. We are committed to avoiding **excessive working hours** that could harm the health and well-being of workers.

3. Paid Annual Leave Entitlement We recognize the right to rest and leisure as essential for physical and mental well-being.

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- We guarantee all employees a **paid annual leave entitlement** that meets or exceeds local regulations, without any negative impact on wages or social security benefits.

4. Equal Remuneration Fedrigoni applies a zero-tolerance policy towards any form of wage discrimination.

- We are committed to ensuring **equal remuneration for men and women for work of equal value**, basing compensation exclusively on skills, responsibilities, and performance, without gender distinction.
- We conduct periodic reviews to identify and address potential gender pay gaps.

5. Notice Period Before Mass Termination We recognize the social impact of significant corporate decisions.

- In the event of significant operational changes involving **mass terminations**, we are committed to providing a minimum **notice period** and to consulting in advance with employee representatives and trade unions, in accordance with national laws and collective agreements, to mitigate negative impacts on the affected employees.
- We also provide **training, reskilling, or redeployment support** where possible, to mitigate negative effects resulting from organizational changes, industrial transitions, or climate-related transformations.

As part of good governance practices, we regularly engage with workers' representatives and social partners to gather feedback on working conditions and to support continuous improvement.

Governance and Oversight

The Board of Directors oversees this commitment, supported by the ESG Committee and relevant Group functions. Our Labour rights and employment practices policy 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 Labour rights and employment practices' performance. Our annual Sustainability Statement is written in accordance with externally recognized frameworks and includes our targets and results. This policy is publicly available on our website communicated to all internal and external stakeholders.

Monitoring

We conduct periodic internal audits and checks within our supply chain to ensure compliance with these principles.

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Grievance mechanism

All Group representatives, employees, collaborators, consultants, business partners and members of local communities can report on any situation of which they become aware of where there is evidence of potential negative impacts on the labour rights and employment practices of individuals through our reporting channels. The Group Whistleblowing policy applies to every Recipient.

Implementation

Fedrigoni is committed to effectively implementing this Policy across all operations by embedding its principles into daily practices. Key actions include:

- **Communication & training:** Regular communication and targeted training ensure employees understand the Policy and their role. Upskilling opportunities support adaptation to technological and climate transitions.
- **Monitoring systems:** Wage levels, working hours, overtime and leave are monitored to ensure compliance with commitments and local regulations.
- **Supplementary social protection:** Fedrigoni offers additional welfare measures beyond statutory requirements, including enhanced benefits and insurance, tailored to local contexts.
- **Stakeholder & partner engagement:** We promote Policy principles among suppliers and partners, fostering alignment with international labour standards through sector initiatives and multi-stakeholder programs

Policy update

This policy is periodically updated based on changes in context and to remain aligned with international best practices.

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

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