



SAVINO DEL BENE

Global Logistics and Forwarding Company



HUMAN RIGHTS POLICY

SAVINO DEL BENE GROUP



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1. INTRODUCTION

Human rights belong to every individual irrespective of nationality, religious beliefs, place of residence, age, sex and sexual orientation, ethnicity, race, language, mental or physical disability or other any condition.

Human rights are defined as such because they are **universal** and are based on the premise that every human being deserves to be respected and treated with dignity.

Universality is not the only fundamental characteristic of human rights; other principles are just as important. In particular, human rights are **inalienable**, meaning they cannot be taken or given away but, in some cases expressly provided for by law, they may be subject to limitations.

Human rights are also **interdependent**, meaning the implementation of one allows for the improvement of others or, vice versa, the violation of any given right comprises enjoyment of other rights.

There are no hierarchies in the context of human rights, regardless of whether the rights are civil, political, economic, social or cultural in nature. Furthermore, no single right can be viewed independently of others. Therefore, human rights also correspond to the principle of **indivisibility**.

Lastly, human rights **cannot be discriminated against**, and must therefore be guaranteed to everyone with no distinction whatsoever.

Respect for human rights makes it possible to protect several fundamental interests, such as safety, freedom, personal inviolability, social equality, socioeconomic and collective interests.

For each of the aforementioned terms, it is important to define its specific use in the context of this document. In particular, **“safety”** means protecting people from any type of crime (e.g. murder, slaughter, torture and kidnapping).

“Freedom” This term encompasses a wide range of rights, including: freedom of thought, religion, association, assembly, to form movements, participate in political life through freedom of expression, to vote and hold public office.

“Personal inviolability” means protection from abuses of the judicial system such as detention without trial or with a so-called secret trial or with disproportionate punishment.



“Social equality” means fair access to citizenship, equality before the law and abolishing discrimination.

“Socioeconomic interests” mean access to decent living conditions, including access to economic resources, decent work and fair distribution of wealth.

“Collective interests” mean the objectives, values and needs that go beyond individual interests, involving society as a whole. These collective interests are reflected in a company’s responsibility to respect human rights not only with regard to its employees, but also local communities, consumers, suppliers and other external parties that could be affected by its activities.

2. PURPOSE AND SCOPE OF APPLICATION

The scope of this policy is to enshrine respect for human rights as an essential requirement in Savino Del Bene Group’s operations. To this end, the Group aims to implement processes through which it is committed to respect the fundamental human rights, outlined below, that may be adversely impacted by activities carried out directly or indirectly:

- decent working hours for all workers, which make it possible to enjoy a good quality of life, ensuring reconciliation between personal life, rest and recovery and preventing excess workloads that could compromise physical and mental well-being;
- adequate remuneration that allows workers to live with dignity;
- minimum working age that protects minors, ensuring that work cannot harm their physical, mental and social development and that it is compatible with their right to education and well-being;
- workplace conditions that support the physical and mental well-being of employees, by fostering healthy and sustainable working conditions;
- accessibility to disabled people, understood not simply as physical accessibility, but also as recognition of their right to actively participate in social and working life;
- protection of parenthood in order to ensure that parents are not penalised in their right to raise children;
- the prohibition of harassment and forced/compulsory labour of the Group’s employees, as well as those who work for the Group’s suppliers;



- rights related to the health and safety of workers, ensuring an environment free from risks to both physical and mental wellbeing;
- rights established in agreement with workers' representatives, which reflect the principle that workers, through their representatives, play an active role in defining and negotiating the rights and conditions that must be respected in the workplace.

3. RECIPIENTS

The recipients of this policy include:

- Members of the Board of Directors of the Group's Companies;
- Employees and/or collaborators of Savino Del Bene Group's Companies, in Italy and abroad;
- Suppliers of goods and/or services;
- Business or operating partners with a role in projects and operations;
- External collaborators who provide, directly or indirectly, services associated with business activities (consultants, external professionals);
- Independent auditors;
- Members of the Board of Statutory Auditors;
- Any parties with whom Savino Del Bene S.p.A. has a relationship by virtue of the law or who operate both in Italy and abroad to achieve Savino Del Bene S.p.A.'s objectives, each within the scope of their respective functions and responsibilities.

4. SAVINO DEL BENE'S COMMITMENT TO HUMAN RIGHTS

Savino Del Bene recognizes its role as a key player in its market sector and acknowledges its responsibility to respect human rights and protect the well-being of the people who work for or collaborate with the company, including employees, suppliers and business partners.

Savino Del Bene promotes a policy that strives for the tangible implementation of the United Nations Universal Declaration of Human Rights, the ILO Fundamental Conventions, the OECD Guidelines for Multinational Enterprises and the principles set out by the United Nations Global Compact.



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In developing its international business and collaborating with partners, Savino Del Bene is committed to protecting and promoting human rights as inalienable and indispensable prerogatives of all individuals. These rights form the foundation of a society based on the principles of equality, solidarity, rejection of war, and the protection of civil and political rights, as well as social, economic, cultural and so-called third generation rights – including the rights to self-determination, peace, development, and environmental protection.

Savino Del Bene strives to create sustainable and shared value with all its internal and external stakeholders, by pursuing excellence, promoting innovation and respecting diversity along the entire value chain of its business of operation. Innovation and sustainability are key elements of the business strategy, complemented by a strong commitment to service and a focus on the well-being of people and society. By adopting this policy, Savino Del Bene commits to respect all human rights in line with the criteria listed in the “UN Global Compact. A Guide for business: how to develop a Human Rights Policy” issued by the United Nations (UN). The Company undertakes to oversee the application of this policy in various ways, by:

- a. Identifying a specific due diligence process;
- b. Promoting inclusive conduct in line with the principles of this policy;
- c. Communicating action plans designed to prevent and address critical issues.

The policy establishes the commitments and responsibilities that all employees and/or collaborators of the Parent Company and its Subsidiaries adopt in relation to human rights, with particular reference to the conduct of business and company activities, as well as the standards that the Group’s stakeholders are required to follow.

In accordance with the principles of the Code of Ethics, the provisions of the Organisation, Management and Control Model adopted by Savino Del Bene and the rules contained in company policy, Savino Del Bene adopts a dynamic approach to risk assessment, by conducting evaluations and periodic monitoring of relevant indicators to support the ongoing improvement and review of company’s risk mapping.

These evaluations are performed across all risks and opportunities identified as part of the risk assessment process and supplement the business impact assessments.



4.1 International Reference Framework

The policy indicated in this document supports the following fundamental values of international and European law and applies their founding principles:

- The Universal Declaration of Human Rights
- The International Covenant on Civil and Political Rights
- The International Covenant on Economic, Social and Cultural Rights
- The fundamental conventions of the International Labour Organization (ILO) – 29, 87, 98, 100, 105, 111, 138 and 182 – and its Declaration on Fundamental Principles and Rights at Work
- The UN Convention on the Rights of the Child
- The European Convention on Human Rights
- The Treaty on the European Union (Art. 2, 3, 6 and 21)
- The Treaty on the Functioning of the European Union (Art. 205)
- CSRD (EU – 2022/2464)
- CSDDD (EU – 2024/1760)

Furthermore, the latest editions of the following private sector standards and voluntary initiatives have been taken into consideration:

- The 10 Principles of the UN Global Compact
- The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- The ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy
- The Guiding Principles on Business and Human Rights: Implementing the UN “Protect, Respect and Remedy” Framework
- The United Kingdom Modern Slavery Act 2015



- Standard No. 5 of the “Performance standards on Environmental and Social Sustainability” of the International Finance Corporation

4.2 Internal Reference Framework

The following internal documents are connected to the principles listed in this policy and support its implementation:

- Code of Ethics
- Supplier Code of Conduct
- Anti-Bribery Guidelines
- Organisation and Management Model pursuant to Italian Legislative Decree No. 231 of 8 June 2001 (“231 Model”);
- IT and Digital Accessibility Regulation
- Application of the General Data Protection Regulation (Regulation (EU) 2016/679) of 25/05/2018

5. REFERENCE PRINCIPLES

The principles included in this section take account of their relevance in the context of the Company’s activities and business relations. The Group undertakes to follow these principles in every country where it operates, considering the local cultural, social and economic differences, and requires that all stakeholders adopt conduct in line with these principles, paying particular attention to high-risk contexts or those involving conflict. Stakeholders are all those with a direct or indirect interest in the Group’s activities, such as customers, employees, suppliers, contractors, partners, other businesses and trade associations, the financial community, civil society, local communities, national and international institutions, the media and the organisations and institutions that represent them. Particularly, in addition to guaranteeing the necessary quality standards, suppliers’ services must align with a commitment to adopt best practices concerning human rights and working conditions (including adequate working hours, rejection of forced or child labour, respect for personal dignity, non-discrimination and inclusion



of diversity, freedom of association and collective bargaining, occupational health and safety, environmental responsibility and respect for privacy).

5.1 Work Practices

5.1.1 Rejection of forced or compulsory labour and child labour

The Company protects the right to decent work, rejecting the use of any kind of forced or compulsory labour and all forms of slavery and human trafficking – as defined by ILO Convention 29 – and does not confiscate money or identity documents for the purpose of holding workers against their will. Please note that **“forced or compulsory labour”** means all work or service which is demanded from any person under the menace of any penalty and for which the said person has not offered himself voluntarily (see Art. 2, sec. 1, ILO Convention 29). Children and underage workers represent a high risk category, so it is important to pay particular attention to safeguarding their rights throughout the company’s value chain. The Company rejects the use of child labour, as defined in the current legislation of the country where activities are carried out. In any case, the age must not be lower than the minimum age established by ILO Convention 138.

5.1.2 Respect for diversity and non-discrimination, with “discrimination” understood as both direct and indirect, respectively:

- a) any distinction, exclusion or preference made on the basis of ethnicity, race, sex, sexual orientation, gender identity, religion, political opinion, national extraction or social origin, which has the effect of nullifying or altering equality of opportunity or treatment in employment or occupation;
- b) any other distinction, exclusion or preference which has the effect of nullifying or altering equality of opportunity or treatment in employment or occupation. (See Art. 1, para. 1, ILO Convention 111).

The Company promotes the principles of diversity, inclusion, equal treatment and opportunity and undertakes to guarantee the right to working conditions that respect the dignity of all



individuals, and to create a working environment in which people are treated fairly and valued for their unique characteristics. The Company is also committed to promoting the physical and mental wellbeing, as well as the individuality, of each person by opposing all forms of discrimination against gender, age, disability, nationality, sexual orientation, gender identity, ethnicity, religion, political opinion, or any other form of individual diversity, as well as any actions that harm an individual or their beliefs and preferences. Equally, the Company promotes freedom of expression. Any form of physical, verbal, visual, psychological, discriminatory or sexual harassment that creates a degrading, hostile, humiliating, intimidating, offensive or unsafe work environment is strictly prohibited and not tolerated. Furthermore, in compliance with current legislation, the Group does not discriminate against people with disabilities during recruitment or hiring processes, nor in the professional development of employees belonging to vulnerable categories.

5.1.3 Freedom of association and collective bargaining

The Company recognises the right of its employees to form or take part in organisations intended to defend and promote their interests. In the same way, it respects their right to be represented, within different business units, by trade unions or other forms of elected representation according to current legislation and practices in the various countries in which they operate.

5.1.4 Health, safety and well-being

Savino Del Bene guarantees stable and ongoing employment in a safe and protected environment.

The Company is committed to fostering and promoting a strong culture of health, safety and well-being, aiming to guarantee a risk-free work environment and to promote conduct that supports the integration of work and personal life. The Company aims to promote personal and organisational well-being as key drivers of employee engagement and individual innovative potential. To this end, it actively promotes risk awareness and encourages responsible conduct



from all stakeholders. Contractors and suppliers are normally involved in awareness campaigns: all individuals must feel responsible for their own health and safety and for that of others.

The Company is committed to integrating health and safety into training processes and activities, the rigorous selection and management of suppliers/contractors, the sharing of information and ongoing external benchmarking.

5.1.5 Fair and favourable working conditions

Those who work with the Group's Companies are entitled to conditions that respect their health, safety, well-being and dignity, maximum number of working hours, periods of rest throughout the day and during the week, and a period of paid annual leave. The remuneration of the Group's employees reflects the principle of fair compensation and equal remuneration for men and women performing work of equal value, based on an objective evaluation of the tasks to be carried out (ILO Convention 100). The minimum remuneration of the Group's employees cannot be lower than that established by collective labour agreements and current legislative and regulatory treaties in force in the various countries, in accordance with the provisions of the ILO Conventions.

5.1.6 Career management

The Company undertakes to create a dynamic environment that promotes the skills of employees, increasing their satisfaction and aligning career development with the strategic needs of the organisation. The Company guarantees opportunities for growth to all employees regardless of gender, ethnicity, sexual orientation or other characteristics, by promoting inclusivity and diversity in career decisions.

The Company offers continuous training, through the development of specific training plans, with the intention of helping employees to progress by developing individual expertise in line with business goals.

It also manages an international mobility plan to offer overseas career opportunities to its employees.



5.2 Community and Society

5.2.1 Respect for the rights of communities

The Company is aware of the direct and indirect influence that its activities could have on the communities where it operates. Individual conditions, economic and social development and general well-being of communities are closely connected: for this reason the Company intends to conduct its investments sustainably and to promote initiatives of cultural, social and economic value, with respect for local and national communities so as to favour social inclusion. The Company undertakes to respect the rights of local communities and to contribute to their economic and social growth. It also collaborates with suppliers, contractors and partners that respect human rights and contribute to the socioeconomic development of the communities where they operate.

5.2.2 Integrity

The Company rejects all direct and indirect forms of corruption, recognizing it as a significant factor that undermines institutions, democracy, ethical values, justice, and the well-being and development of society. The Company has set out ad hoc anti-bribery principles in the specific “Anti-Bribery Guidelines” protocol, which is an integral part of the Organisation, Management and Control Model pursuant to Italian Legislative Decree No. 231/2001.



5.2.3 Privacy

The Company respects the confidentiality and privacy of its stakeholders and is committed to the correct use of data and information provided by employees, customers, and other stakeholders.

The protection and processing of personal data poses a considerable challenge in the era of digitalisation and globalisation of markets. The Company processes personal data in compliance with all fundamental rights and adheres to the freedoms and principles recognised by law, in particular the respect for private and family life, domicile and communications, the protection of personal data, freedom of thought, conscience and religion, freedom of expression and information. Privacy “by design” (i.e., incorporated from the very start of the design of a company process) and “by default” (i.e., the processing of personal data to the extent necessary and sufficient for the envisaged purposes and for the period of time strictly necessary) are an integral part of the company digitalisation processes, as are risk analysis and protection of sensitive data. People’s privacy is protected by adopting international standards, and personal data processing and storage methods are defined with the support of external consultancy firms in accordance with company policy and various European and national regulations. The Company also sets itself the aim of monitoring third-party companies that find themselves using customers’ personal data and identifying, where necessary, dedicated clauses in contracts with the partners that use personal data to perform specific activities, such as sales or customer satisfaction surveys.

5.2.4 Communication

The Company is committed to non-discriminatory institutional and commercial communication that respects different cultures.

Furthermore, it requires that the contracts and communications sent to customers be:

- clear and simple, using language that closely aligns with that commonly used by stakeholders;
- compliant with current legislation, without using exclusionary or improper practices;
- complete, so as not to leave out any element relevant to the customer’s decision;



- available on the company website.

6. IMPLEMENTATION AND MONITORING

The Board of Directors of the Parent Company approves this policy and its updates during the approval of the financial statements, and it is sent to all of the Group's Companies for them to read and approve. Based on the guidelines outlined in this document, the Group's Companies will take measures to ensure the respect and protection of the principles contained herein.

Implementation is the responsibility of the department managers who are tasked with transposing the contents of the policy and promoting its knowledge and dissemination within their areas of responsibility. Monitoring is carried out through the analysis of any reports from stakeholders. The resulting action plans are managed centrally to ensure global harmonization and integration of processes and policies applied at local level.

The processes to identify, prevent and mitigate the adverse impacts on human rights that the Company may cause or contribute to through its activities (due diligence) are based on the Guiding Principles on Business and Human Rights, approved by the United Nations Human Rights Council in June 2011.

With reference to Group employees and collaborators, the entire due diligence process is coordinated by the QHSE department in collaboration with the HR department. The aims of the due diligence carried out in this context by the Company are as follows:

- Identification and mapping of human rights risks arising from the Group's operations within the Enterprise Risk Management System;
- Assessment and evaluation of potential risks;
- Identification of residual risk net of mitigation measures implemented;
- Identification and analysis of the internal regulatory framework pertaining to each topic;
- Definition of ad hoc policies and/or procedures for specific aspects;



- Adoption of a management system that monitors and tracks performance regularly, through the definition of specific KPIs;
- Definition of responsibilities in the context of the established procedures and risks;
- Provision for a process of gradual improvement that, starting from simple compliance with local laws, guides the policies and processes pertaining to human rights through appropriate stakeholder engagement initiatives;
- Compliance with the ESRS (European Sustainability Reporting Standards);
- Identification of the functions responsible for monitoring the progress of action plans developed in response to potential risks identified through the self-assessment process.

In order to guarantee maximum transparency, **the results of the due diligence** performed on employees and collaborators are **reported in the Sustainability Report**. Anonymous reporting mechanisms are provided according to company procedures, available at <http://www.savinodelbene.com>.

With reference to the Group's suppliers, Savino Del Bene seeks to guarantee that the qualification process will ensure equal opportunities for all once the required quality standards are met. Savino Del Bene implements a supplier qualification process that differentiates them based on their criticality. The Company uses a dedicated platform to manage processes, documentation, and questionnaires sent to suppliers. Considerable attention is also dedicated to managing economic, environmental, and social risks associated with strategic suppliers and/or those involved in more critical product categories.

The Company performs qualification activities in accordance with the specific procedure outlined in the Quality Manual, taking into account the supplier's significance, such as annual turnover, and its strategic relevance within a given line of business, where applicable.

Suppliers are required to know the principles of the **Group's Code of Ethics, the Anti-Bribery Guidelines and the Supplier Code of Ethics** adopted by the Company that constitute an integral part of the Organisation, Management and Control Model pursuant to Italian Legislative Decree



No. 231/2001. All new suppliers/subcontractors, in order to receive orders from the Savino Del Bene Group, must sign this document and undertake to adopt conduct that complies with the principles of **loyalty, transparency and correctness** set forth in the documents referred to above.

Irregularities, contractual breaches and violations of the agreed standards may result in reports of anomalies or critical issues, and may lead Savino Del Bene to limit, suspend, or revoke the qualification of the non-complaint supplier.

As part of the monitoring activities of each supplier, the Company may, especially in the presence of ongoing extraordinary operations and/or business acquisitions, perform **legal and/or reputational checks** of such parties.

Supplier performance is evaluated through the use of the following tools:

- **Feedback:** service evaluation questionnaires filled out periodically by the contract manager;
- **Technical audits:** periodic inspections on all suppliers operating in certain product sectors and random checks on suppliers operating in other sectors to verify the application of and compliance with legislative and contractual provisions;
- **ESG questionnaires:** questionnaires aimed at gathering information on suppliers' initiatives, activities, and any certifications obtained in the context of sustainability, with particular focus on human rights and the environmental issues.
- **Rating index:** evaluations based on quantitative and qualitative parameters that take into consideration, with various weighting levels, the information obtained from the tools used.

The Company highlights the progress and effectiveness of the supplier qualification, management, monitoring, and scoring system, providing annual updates on the results of the analysis in the Sustainability Report.

In order to guarantee maximum transparency, as is envisaged for employees and/or collaborators, **the results of the auditing activities** carried out on the Group's suppliers are



reported in the Sustainability Report. Anonymous reporting mechanisms are provided according to company procedures, available at <http://www.savinodelbene.com>.

6.1 Responsibilities of the competent company functions

The top executive level in the corporate organisation, responsible for implementing this policy, is the ESG Committee. The committee is formed of three permanent members: the Executive Vice President and member of the Board of Directors, the Vice President and member of the Leadership Committee, and the QHSE and Sustainability Manager. The Committee involves department managers to tackle specific topics.

The QHSE department and the HR department, depending on the specific topics addressed, are responsible for ensuring compliance, updating, implementation, and monitoring of this policy, as well as the preparation and archiving of the related documentation.

Any amendment and/or additions to the contents of this policy is subject to approval by the Board of Directors of Savino Del Bene S.p.A.

6.2 Stakeholder reporting

Following the due diligence process, Savino Del Bene is committed to implementing all necessary corrective actions to mitigate potential human rights risks and to establish a continuous internal and external monitoring system to ensure compliance with fundamental rights and to prevent any irregularities.

In order to manage irregularities and violations of the principles contained in the company's Code of Ethics and in the Human Rights Policy, a specific reporting system (whistleblowing system) is available to all employees and collaborators, as well as third parties (via the website and various channels), which defines a detailed process for the management, analysis and investigation of the irregularities communicated, as well as the adoption of any mitigation measures and actions. Furthermore, to protect against any violations of human rights, a disciplinary system is in place to sanction non-compliance with the principles and company rules, which are applicable to all parties within Savino Del Bene. The Savino Del Bene Supervisory Body reports any violations to the competent functions and monitors, in agreement with the Human



Resources department, the application of the disciplinary measures. Any corrective measures adopted are proportionate to the extent of the irregularity and the disputed act. Once the report is received, the department conducts an analysis, speaking with the author and the party responsible for the alleged violation, if appropriate, ensuring equal treatment at Group level, in accordance with company policy and local legislation. The Company takes measures to guarantee that whistleblowers do not experience any form of retaliation, ensuring the confidentiality of the whistleblower's identity, with the exception of legal obligations. Reports can be sent using the methods provided in the "Whistleblowing Procedure" published on the website of Savino Del Bene S.p.A.

7. COMMUNICATION, TRAINING AND INFORMATION

The Human Rights Policy is brought to the attention of internal and external stakeholders through dedicated communication channels, such as its publication on the Company's website. In order to ensure that the policy is understood correctly, a **training and information plan** is prepared to promote awareness of the principles contained therein.

The QHSE and HR departments are available, each within their specific area of competence, for any requests for clarification and/or further information regarding the contents of this policy, at the following e-mail addresses: qhse@savinodelbene.com and hr@savinodelbene.com.