

Newlat Food Group	Human Rights Policy	Rev.1 Page 1/6
--------------------------	----------------------------	---------------------------

HUMAN RIGHTS POLICY

Approved on:	09/09/2022	Approved by	BoD of the parent Company Newlat Food S.p.A.	Effective date:	09/09/2022
---------------------	-------------------	--------------------	---	------------------------	-------------------

INTRODUCTION 3

FOREWORD 3

PURPOSE 3

BACKGROUND REFERENCE 3

External legislation and standards..... 3

INTERNAL REGULATIONS AND STANDARDS..... 3

THE GROUP’S COMMITMENT TO THE PROTECTION OF HUMAN RIGHTS 4

CHILD LABOUR 4

FORCED OR COMPULSORY LABOUR..... 4

FAIR AND FAVOURABLE WORKING CONDITIONS AND REMUNERATION POLICIES..... 4

WORKING HOURS..... 4

FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING 4

HEALTH AND SAFETY AT WORK 4

DISCRIMINATION 5

RIGHTS OF LOCAL COMMUNITIES AND ENVIRONMENTAL PROTECTION 5

PRIVACY 5

PREVENTION OF CORRUPTION 5

CONSUMER HEALTH AND RESPONSIBLE MARKETING..... 5

ENFORCEMENT, MONITORING AND RESPONSIBILITIES..... 5

ENFORCEMENT, COMMUNICATION AND UPDATING 5

MONITORING AND REPORTING..... 6

RESPONSIBILITIES 6

Approved on:	09/09/2022	Approved by	BoD of the parent Company Newlat Food S.p.A.	Effective date:	09/09/2022
---------------------	-------------------	--------------------	---	------------------------	-------------------

Introduction

Foreword

The Newlat Food Group's (hereinafter also referred to as "Newlat Food", the "Group" or the "Company") core values include respect for human rights. This principle forms the basis of the Company's culture and strategy and is a priority not only in the Company's internal operations but also in its relations with suppliers, customers, local communities and all of the Group's other partners.

Within the broader concept of 'sustainability', the social dimension has also always been relevant, focusing on the protection of human rights, the development of the individual, the wellbeing of the individual and the community, and the promotion of diversity and equality. Therefore, today, it is essential to respect and promote these values as a fundamental element of proper and responsible management of economic activities.

For this reason, Newlat Food, through its Human Rights Policy, is committed to making a significant contribution to the dissemination of these principles, ensuring that all activities are conducted in accordance with its own rules of conduct, in compliance with relevant national and international standards and regulations.

Purpose

The aim of the Policy is, therefore, to develop and formalise a clear approach on the subject, integrating respect for and promotion of human rights in the Group's broader sustainability strategy and preventing and sanctioning all forms of violation of these principles throughout the value chain.

In concrete terms, through this Policy, Newlat Food is committed to pursuing the following objectives:

- defining the Group's commitments with regard to the protection and promotion of human rights and promoting a working environment that guarantees their respect;
- increasing employees' awareness of human rights, also through the development of training programmes and specific projects;
- complying with relevant laws and regulations with reference to the regulatory framework of the countries in which the Group operates, to national and international standards and to identified best practices;
- identifying any form of violation of human rights in its supply chain and find reliable partners with whom to initiate long-lasting collaborations;
- encouraging the commitment of all suppliers, customers, collaborators and partners of the Group to act with respect and integrity in all relations with colleagues, customers and all actors with whom they interact.

Background Reference

The following are the external and internal regulatory references and standards considered in the definition of this Policy.

External legislation and standards

- Charter of Fundamental Rights of the European Union;
- United Nations (UN) Universal Declaration of Human Rights;
- Fundamental Conventions of the International Labour Organisation (ILO);
- UN Global Compact principles;
- Agenda 2030 for Sustainable Development adopted by the UN General Assembly and its 17 Sustainable Development Goals (SDGs);
- SA8000 International Standard developed by Social Accountability International (SA8000:2014);
- Health and safety regulations in force in the countries where the Group's plants are located;
- Principles contained in the Modern Slavery Act (2015);
- OECD Guidelines for Multinational Enterprises.

Internal regulations and standards

- Group Code of Ethics and Conduct;

Approved on:	09/09/2022	Approved by	BoD of the parent Company Newlat Food S.p.A.	Effective date:	09/09/2022
---------------------	-------------------	--------------------	---	------------------------	-------------------

- Organisation, Management and Control Models adopted pursuant to Italian Legislative Decree 231/2001 by the main Group Companies;
- Diversity and Inclusion Policy;
- Integrated Management System Policy.

The Group's commitment to the protection of human rights

The Group's commitment to human rights focuses on the following issues, acknowledging that environmental, socio-cultural and market changes can always lead to new forms of violation of the rights of individuals, which must, as far as possible, be preventively identified, prevented and countered.

Child labour

Newlat Food rejects the use of any form of child labour and of people under the minimum age established by law, as defined by the regulations in force in the countries where the Group operates. In addition, the Company is committed to preventing children or young workers from being, in any way, exposed to situations that are risky or harmful to their physical and mental health and development, both inside and outside the workplace.

Forced or compulsory labour

No form of recourse to or support for illegal labour involving services subjected to illegitimate forms of physical or psychological coercion is permitted. The Group treats all personnel with dignity and respect, prohibiting any offensive, threatening, exploitative or coercive attitude or behaviour (including gestures, verbal abuse or physical harassment) in the workplace.

Fair and favourable working conditions and remuneration policies

The Group is committed to ensuring that working conditions, benefits and remuneration policies are fair and equitable, in line with contractual and market requirements. The Company, therefore, uses salary policies that guarantee salary levels in line with the contractual provisions of the reference sector and with the regulations in force in the countries in which the Group operates.

Working hours

The Group complies with the legislation in force and with industry standards on working hours, both ordinary and overtime, providing adequate rest periods in compliance with the provisions of the law and the collective agreements applied.

Freedom of association and the right to collective bargaining

Freedom of association and collective bargaining are recognised as instruments for the defence and promotion of the interests and contractual conditions of the employees. Therefore, the Company is committed to recognising and defending workers' freedom of political and religious expression, guaranteeing freedom of association also through a responsible and constructive dialogue with labour protection organisations, thus fostering a climate of mutual respect in line with the principles of rights protection. The Group also ensures that employee representatives are not penalised or subjected to forms of retaliation in any way.

Health and safety at work

For Newlat Food, the protection of fundamental human rights is inseparable from the right to work in environments and conditions that ensure the health and safety of workers. Therefore, each Company that is part of the Group is committed to creating and maintaining healthy and safe environments, workstations, equipment and production and working methods, in full compliance with current occupational health and safety regulations.

The Group requires third parties operating at its facilities to comply with the occupational safety measures established by law and provides appropriate information to those who access the Company's buildings, facilities and plants as visitors.

Approved on:	09/09/2022	Approved by	BoD of the parent Company Newlat Food S.p.A.	Effective date:	09/09/2022
--------------	------------	-------------	---	-----------------	------------

Discrimination

Right from the selection process and throughout the career path, the Group adopts and promotes behaviour based on fairness and the protection of personal dignity. This commitment also results into the dissemination of a corporate culture based on the promotion of a work environment free of any discrimination. As stated in the Diversity and Inclusion Policy, the Company strongly condemns and opposes with positive actions any direct or indirect form of discrimination based on differences of sex, ethnicity, nationality, religion, age, disability, gender, sexual orientation, marital status, membership of political parties or associations, physical and/or economic condition and any other possible form of intolerance. At the same time, the Group recognises the respect and promotion of diversity as an added value for the development of a successful corporate culture capable of enhancing Human Capital.

Rights of local communities and environmental protection

The Group is committed to respecting the rights of communities in the areas where it operates with the aim of reducing the social and environmental impact of its activities for the benefit of the community and future generations. In addition to strict compliance with environmental legislation, the Group is constantly engaged in preventive actions aimed at avoiding or at least minimising its impacts.

Moreover, the company has always been committed to promoting initiatives aimed at enhancing and developing local communities and the territory. This is possible thanks to, among others, a solid relationship and a stable cooperation with its stakeholders, in order to create long-term value and opportunities for growth and development.

Privacy

Newlat Food is committed to respecting the right to privacy and the protection of the personal data and information of all persons working towards the achievement of the Group's objectives by avoiding improper use of information, in compliance with relevant regulations.

Prevention of corruption

For the Group, corruption represents both a factor of discrimination that violates the right of all individuals to equal opportunities and an obstacle to economic and social development with negative impacts on communities. Newlat Food is therefore committed to implementing all measures necessary to prevent and avoid all forms of corruption, active or passive, bribery and other offences aimed at procuring direct or indirect advantages for the Company in line with the principles contained in the Group's Code of Ethics and Conduct and in compliance with the regulations in force in the countries where it operates.

Consumer health and responsible marketing

The Group guarantees consumers the right to have access to accurate, complete and truthful information to enable them to make rational and informed decisions. Furthermore, aware of the importance of the correct use of advertising media, the Company encourages the adoption of high standards of responsibility and transparency in the promotion of its products.

Enforcement, monitoring and responsibilities

Enforcement, communication and updating

This Policy was formally approved by the Board of Directors of the Parent Company Newlat Food S.p.A. on 09/09/2022 and applies to the employees, corporate bodies, collaborators, suppliers, customers and other partners of all Newlat Food Group companies falling within the scope of consolidation, together with the laws and regulations in force in the countries where the Group operates, permeating the Company's culture on the basis of the principles of conduct already defined in the Code of Ethics and Conduct and other Company policies and strategies and external regulations.

Newlat Food promotes the adoption of the contents of the Policy by all Group companies, including those abroad, communicating it to all personnel and making it available to interested Stakeholders through

Approved on:	09/09/2022	Approved by	BoD of the parent Company Newlat Food S.p.A.	Effective date:	09/09/2022
--------------	------------	-------------	---	-----------------	------------

appropriate communication channels in addition to the corporate website. The Group also undertakes to keep this document and programmes on the protection and promotion of human rights active and to systematically update them in the light of evidence emerging from due diligence activities, internal assessments and the monitoring of national and international trends.

Monitoring and reporting

Newlat Food adopts a monitoring system that ensures verification of the progress achieved in managing the issues mentioned in this Policy. The Group monitors the effectiveness of the approach adopted through dedicated tools. These include procedures for the periodic identification and assessment of risks inside and outside the Company, due diligence activities, a system for reporting violations, a penalty system and dialogue activities with stakeholders.

All recipients are required to report any conduct that does not comply with the principles contained in this Policy, by referring - as described in the Group's Code of Ethics and Conduct - to the channel that can be accessed from the 'Whistleblowing' section of the website <https://www.newlat.it/>, or by inserting a written communication in the mailboxes provided in the company areas.

Responsibilities

Human rights strategies and policies require the involvement of all corporate functions with responsibilities in this area.

On the one hand, the Board of Directors is responsible for the promotion and observance of the principles stated in this Policy.

On the other hand, Management and Department Heads play a crucial role in ensuring that the principles contained in this Policy are respected, not only within the Group's internal operations, but also along the entire value chain, intervening whenever they are aware of conduct, actions and activities that constitute a violation of human rights.

In addition, the Sustainability Department is responsible for defining and periodically updating the contents of this Policy, for the systematic monitoring of relevant indicators and for reporting on them within the Consolidated Non-Financial Statement, contained within the Annual Financial Report and drafted according to the international standard 'GRI Sustainability Reporting Standards'.

Approved on:	09/09/2022	Approved by	BoD of the parent Company Newlat Food S.p.A.	Effective date:	09/09/2022
---------------------	-------------------	--------------------	---	------------------------	-------------------