

SAMMONTANA GROUP POLICY

Human Rights Policy



Edition 2025 - 2026

1. Purpose and Scope of Application

This Policy formalizes the Sammontana Group's commitment to respecting and promoting human rights in all its activities, operations, and value chain. The goal is to ensure that our practices are consistent with the highest ethical standards and with the international commitments undertaken by Italy and the European Union.

This Policy applies to:

- All employees, collaborators, and managers of the Company.
- Suppliers, business partners, contractors, and subcontractors.
- Communities and individuals potentially impacted by our operations and products.

2. Regulatory References and International Frameworks

Sammontana Group undertakes to act in compliance with:

- UN Guiding Principles on Business and Human Rights (UNGPs).
- Universal Declaration of Human Rights.
- Fundamental Conventions of the International Labour Organization (ILO).
- UN Convention on the Rights of the Child and other relevant international treaties.
- EU and national legislation on human rights, labour, and sustainability (e.g., CSRD/ESRS, upcoming CSDDD).

3. Corporate Commitment

- Respect for fundamental human rights in all activities, without exception.
- Due Diligence: identify, prevent, mitigate, and remedy negative impacts on human rights throughout our operations and supply chain.
- Zero tolerance for child labour, forced labour, human trafficking, discrimination, and harassment.
- Health and safety as an absolute priority for our own and contracted workers.
- Equity and inclusion in hiring, compensation, and professional development practices.
- Freedom of association and collective bargaining as fundamental rights.
- Protection of data and privacy of customers, employees, and partners.
- Respect for local communities, including those impacted by the supply chain, and constructive dialogue with stakeholders.

4. Expectations for Business Partners

We require suppliers and partners to:

- Adhere to the principles of this Policy and the ethical conduct requirements set out in our Supplier Code.
- Implement due diligence systems to monitor risks of human rights violations in their activities and supply chains.
- Collaborate in audit, monitoring, and remediation processes.

5. Monitoring, Reporting, and Review

- The Company will publish annual information on due diligence activities and managed impacts as part of the Sustainability Report (GRI/ESRS).
- Key Performance Indicators (KPIs) will be used to monitor Policy implementation.
- The Policy will be reviewed at least every two years and updated based on regulatory developments, operational context, and stakeholder feedback.

6. Roles and Responsibilities

<i>Sustainability/ESG</i>	Responsible for the operational coordination of due diligence
<i>Purchasing, HR, HSE, Compliance</i>	Integrate the principles of the Policy into their respective processes
<i>Employees and Managers</i>	All are required to act in accordance with the principles and objectives of this Policy
<i>Board of Directors (BoD)</i>	The Board of Directors approves this Policy and supervises its implementation at least annually

7. Lack of Due Diligence

In the event of non-compliance with this Policy, the assessment and management of any violations fall under the responsibility of the Legal Department.

Any violations of this Policy may be reported through the dedicated channel available via the following link:

<https://www.sammontanaitalia.com/it/area-legal/segnalazioni-whistleblowing.html>

Empoli, November 17, 2025