

Global Human Rights Policy

The Policy applies to Prima Industrie S.p.A. and its subsidiaries (collectively, “Prima Industrie” or the “Company”) and the directors, officers and employees of such entities as well as those acting for or on behalf of such entities including all parties the Company conducts business with including but not limited to, suppliers, service providers, sales representatives, agents, consultants, dealers, distributors, importers, resellers, and joint venture partners (collectively, “Covered Persons”). All Covered Persons have to respect the present Policy, and in case of violations, they will be subject to disciplinary actions, corrective actions, and in the suppliers case potential contract termination.

Prima Industrie 's activities are based on respect for global human rights, which are a non-negotiable fundamental value of its culture and corporate strategy. Prima Industrie works to manage and reduce the potential risk of human rights violations, to avoid causing - or contributing to causing- adverse impacts on these rights within the international, multiracial, socially and economically diverse conditions in which it operates.

Prima Industrie Group activities are governed by its Values and Ethical Code and comply with the Sustainability Model envisaged in the United Nations Global Compact; In particular with respect of the principles 1 and 2 for what concern the human rights and 3,4,5 and 6 related to the labour, here below the details:

HUMAN RIGHTS

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights;

and

Principle 2: make sure that they are not complicit in human rights abuses.

LABOUR

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

The Company respects and protects the fundamental human rights laid down by the laws and regulations of each country where it operates and contained in applicable international standards, including:

- the United Nations International Bill of Human Rights, consisting of the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights;



- the United Nations Convention on the Rights of the Child;
- the International Labour Organization Declaration on Fundamental Principles and Rights at Work and the relevant applicable conventions;
- the European Convention on Human Rights;
- the United Nations Convention against Corruption;
- the Human Trafficking Prevention Act, and the UK Modern Slavery Act 2015.

Prima Industrie promotes respect for human rights and adherence to applicable international standards with its Partners and stakeholders and bases its governance model on the recommendations contained in the UN Guiding Principles on Business and Human Rights, implementing the "Protect, Respect and Remedy " Framework.

PRINCIPLES

- **Non-discrimination** – Prima Industrie does not accept any form of direct or indirect discrimination on the basis of gender, sexual orientation, social and personal position, physical or health condition, disability, religious or political beliefs, union membership, race, ethnicity, nationality, age, and is committed to the prevention of discrimination in all areas of working life.
- **Freedom of Association** – Prima Industrie recognises the right of its employees to form freely trade unions and to collective bargaining, and engages in open and constructive dialogue with representatives of recognised trade unions.
- **Opposition to forced labour** – Prima Industrie does not accept all forms of labour exploitation, including child labour, forced or compulsory labour and all forms of abuse or mental or physical coercion towards both their workers and workers employed along the supply chain, and strongly condemns all forms of human trafficking and exploitation.
- **Adequate working conditions** – Prima Industrie promotes a working environment based on trust, dialogue and mutual respect and protects the welfare and work-life balance of its employees, ensuring decent wages and fair working hours.
- **Occupational health and safety** – Prima Industrie considers the health and safety of workers a core value and proactively maintains a safe and healthy working environment by adopting high standards of prevention, assessment and management of related risks, and by fostering and constantly spreading a corporate culture geared towards occupational health and safety.
- **Local Communities** – Prima Industrie seeks to disseminate and promote its core business values, while respecting local cultures and indigenous people, protecting cultural and natural heritage and local traditions and customs. Prima Industrie contributes to the economic wellbeing and growth of the communities in which it operates by providing support to educational, cultural, and social initiatives for promoting personal development and improving living standards. Prima Industrie believes that dialogue with competent institutions and non-governmental agencies is key to identifying the priority areas for local communities' support.



- **Integrity** – Prima Industrie rejects all forms of corruption in any jurisdiction. To this end, Prima Industrie has identified a Group Compliance Officer and has implemented its compliance help line which constitutes the corporate reference for prevention of corrupt practices and represents a collection of principles and rules aimed at preventing or reducing the risk of corruption.
- **Privacy** – Prima Industrie is aware of the importance of ensuring adequate safeguards to the interested parties concerned with the personal data processing operations and respects the right to privacy of all of its stakeholders, undertaking to use the data and information provided in a correct manner.

Prima Industrie is engaged in the identification, assessment, prevention and mitigation of human rights violation risks, promptly implementing corrective actions if these events occur. In particular:

- raises employees' awareness, through information and training on Code of Ethics topics;
- manages its supply chain in a responsible manner including, in particular, respect for human rights in the supplier selection criteria, and ask the suppliers to acknowledge and/or accept the current Policy.

Prima Industrie is open to cooperation with governmental, non-governmental and sectorial and academic bodies for the development of global policies and principles aimed at protecting human rights and regularly informs its stakeholders about the activities carried out and the performance achieved (about Human Rights), primarily through the Group's annual non-financial report and the corporate website.

Prima Industrie's Top Management, supported by the continuous guidance of **the Sustainability Team**, has a strategic role in the full implementation of this Policy ensuring the involvement of all personnel and of those who collaborate with Prima Industrie and the consistency of their behaviour with the values embodied in this Policy.

The Company provides its stakeholders and Covered Persons with a dedicated channel (compliancehelpline@primaindustrie) for reporting any situation, also anonymous, that in breach of this Policy poses or could pose a risk of Human Rights violation. The current Policy will be time to time updated or integrated considering the possible variation of the internal or external context.

September 2019

Executive Chairman

Gianfranco Carbonato