HUMAN RIGHTS POLICY

人权政策

June 2023

Contents 内容

1. Purpose 目的

A.D.R. Group (from now on also "**A.D.R.**" or "**Group**") is dedicated to actively upholding human rights and ensuring the welfare of employees and partners involved in and associated with the Company. The commitment **to protect and respect human rights** extends to the employees, management staff in all business regions, business partners, and, to the extent of the Group's leverage and responsibility, other entities within the supply chain.

A.D.R.集团(以下也称"A.D.R."（或"集团"）致力于积极维护人权，确保参与和与公司相关的员工和合作伙伴的福利。保护和尊重人权的承诺适用于所有业务区域的员工、管理人员、业务合作伙伴，并在集团的权利和责任范围内，延伸至供应链中的其他实体。

A.D.R. Group understands that human rights issues are extensive and intricate, necessitating a comprehensive approach. Therefore, the Group has identified **sensible areas** across its business activities where the Group concentrate its efforts. This Policy statement sets out the Human Rights Principles for A.D.R. Group's actions and behaviour in relation to each of these key areas. A.D.R. Group expect full engagement from all its employees and business partners in aligning with the Group's priorities throughout the value chain.

人权问题是广泛而复杂的，需要采取综合的方式。因此，集团在其业务活动中确定了合理的领域，并在这些领域集中精力。本政策声明为 A.D.R.集团在每个关键领域的行动和行为制定了人权原则。A.D.R.集团希望其所有员工和业务合作伙伴在整个价值链中与集团保持一致。

2. Scope 范围

This Policy applies to the whole **A.D.R. Group** and its **employees**, regardless of their role or position, as well as to those acting for or on behalf of the Company, in every Business region.

本政策适用于整个 A.D.R.集团及其员工，无论其角色或职位如何，也适用于公司代表或代表公司在每个业务区域的员工。

The Policy applies also to **suppliers** and **business partners**. A.D.R. Group is committed to ensuring that its suppliers, as well as their subcontractors and any other subject belonging to its value chain, adhere to this Policy and embrace its principles.

本政策也适用于供应商和业务合作伙伴。A.D.R.集团致力于确保其供应商及其分包商以及属于其价值链的任何其他主体遵守本政策并接受相关的行为准则。

3. Regulatory framework 监管框架

A.D.R. Group's approach is guided by the principles established by the main internationally recognized standards, regulations and conventions, such as:

集团的要求以国际公认的主要标准、法规和公约所确立的原则为指导, 如:

- The International Bill of Human Rights, which includes the United Nations Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights
- 《联合国世界人权宣言》、《公民权利和政治权利国际公约》和《经济、社会及文化权利国际公约》在内的《国际人权宪章》。
- The UN Guiding Principles on Business and Human Rights
- 联合国工商业与人权指导原则
- The eight Conventions of the International Labour Organization (ILO)
- 国际劳工组织（ILO）的八项公约
- The Guidelines of the Organization for Economic Co-operation and Development (OECD) for Multinational Enterprises
- 经济合作与发展组织（OECD）跨国企业准则
- The Charter of Human Rights of the European Union
- 欧洲联盟人权宪章
- The European Convention on Human Rights
- 欧洲人权公约
- Italian Legislative Decree no. 231/2001
- 意大利 231/2001 法令

4. Human Rights Principles 人权原则

A.D.R. Group is committed to respecting fundamental human rights and ensuring fair and adequate working conditions in all Company facilities and requires all persons covered by the scope of this Policy to do the same. The following is a non-exhaustive list of the main areas of human rights that are intended to be addressed through this Policy.

A.D.R.集团致力于尊重基本人权，确保公司所有设施的公平和适当的工作条件，并要求本政策范围所涵盖的所有人员也这样做。以下是一份旨在通过这项政策解决的主要人权领域的非详尽清单。

A.D.R. Group expects **all its suppliers and business partners** to adhere to the principles set out in this Policy and to respect the fundamental human rights of its employees.

A.D.R.集团期望其所有供应商和业务合作伙伴遵守本政策中规定的原则，并尊重其员工的基本人权。

4.1 Elimination of all forms of forced, compulsory and child labour

消除一切形式的强迫、强制劳动和童工

A.D.R. Group **rejects and prohibits any form of forced or compulsory labour**, as defined by the ILO Fundamental Convention n. 29 on Forced Labour as work extorted by any person under the menace of any penalty. No employee may be coerced into working by force, intimidation, or retaliation. All employees must also be free to terminate their employment with the Company, without fearing any kind of reprisal.

国际劳工组织关于拒绝和禁止任何形式的强迫或强制劳动的第 29 号基本公约将强迫劳动定义为任何人在惩罚的威胁下的工作，集团拒绝并禁止任何形式的强迫或强制劳动。不得以武力、恐吓或报复手段强迫员工工作。所有员工有自由终止与公司的雇佣关系，而不必担心任何形式的报复。

The Group respects children's rights and **does not tolerate child labour** and does not employ persons who are less than 18 years of age or who have not yet reached the minimum age for admission to employment under the law of the relevant country, whichever is the most stringent.

本集团尊重儿童权利，不容忍童工，不雇用未满 18 岁或尚未达到相关国家法律规定的最低就业年龄（以最严格者为准）的人员。

4.2 Elimination of discrimination and harassment 消除歧视和骚扰

A.D.R. Group is committed to **fostering equal employment opportunities** and to creating a work environment where everyone feels welcome and included. All employees should be able to express their selves, regardless of gender, sexual orientation, ethnicity, origin, disability, medical condition, age, cultural and social background, religion, belief, social and marital status, and family responsibility, with no fear of discrimination. The Company prohibits any type of harassment, as it considers it cruel, inhumane, and degrading.

A.D.R.集团致力于促进平等的就业机会，创造一个让每个人都感到受欢迎和包容的工作环境。不论性别、性取向、种族、出身、残疾、医疗状况、年龄、文化和社会背景、宗教、信仰、社会和婚姻状况以及家庭责任如何，所有员工都应能够表达自己的意见，而不必担心受到歧视。公司禁止任何形式的骚扰，骚扰行为被认为是残忍、不人道和有辱人格的。

A.D.R. Group is committed to providing equal opportunities to everyone wishing to become part of the Company, prohibiting discrimination and bias of any kind in all recruitment and employment processes. The Company recruits and hires employees based on their experience, knowledge, and

skills and is committed to **providing equal opportunities** to all employees, both on the job and in their career advancement.

A.D.R.集团致力于为希望成为公司一员的每个人提供平等的机会，在所有招聘和雇佣过程中禁止任何形式的歧视和偏见。公司根据员工的经验、知识和技能招聘和雇用员工，并致力于为所有员工提供平等的工作和职业发展机会。

The company consider women's empowerment as a strength. As such, A.D.R. Group **strives to increase women's representation** at all levels and in all departments.

公司认为赋予女性权力是一种优势。因此，A.D.R.集团努力增加妇女在各级和各部门的代表性。

4.3 Freedom of association and the effective recognition of the right to collective bargaining
结社自由和有效承认集体谈判权

A.D.R. Group's employees are free to be represented by **labour organizations or to join a trade union** by locally applicable legislation and practice, including the fundamental right of collective bargaining. It also strives to ensure that persons engaged in the organization or representation of workers and employees taking part in strikes in compliance with the national law are not in any way penalized or subjected to forms of retaliation. The strike shall be approved by the competent department of the labor union which of the district labor union and the municipal labor union.
根据当地适用的法律和惯例，包括集体谈判的基本权利，A.D.R.集团的员工可以自由地由劳工组织代表或加入工会。委员会还致力确保参加工人组织/代表按照国家法律规定进行停工的员工而不受到惩罚或任何形式的报复，停工需得到工会的主管部门区工会、市工会的批准。

4.4 Working hours and fair wages 工作时间和公平工资

Employees must be paid for the effective hours worked, including overtime, following applicable laws and national collective labour agreements, if available and more favourable. A.D.R. Group guarantees working conditions that respect the **health, safety and well-being of its employers**. The Company commits to respect the number of working hours in compliance with all applicable international, national and local legal requirements and national collective labour agreements, to ensure **rest periods** during the day and the week and annual paid leave.
必须按照适用法律和国家集体劳工协议（如果有的话）支付雇员的有效工作时数，包括加班费。A.D.R.集团保证尊重雇员健康、安全和福利的工作条件。公司承诺尊重符合所有适用的国际、国家和地方法律要求以及国家集体劳动协议的工作小时数，确保每天和每周的休息时间以及每年的带薪休假。

Employees are guaranteed **equal pay for equal work** and the Company is committed to eliminating differences in compensation based on gender or any discriminatory bias. Workers must be entitled, at a minimum, to a living wage and must be aware of the amount of their compensation before they start to work, which shall also be written in the employment contract in a language the worker can understand.

致力于员工同工同酬，公司致力于消除基于性别的薪酬差异或任何歧视性偏见。工人必须至少有权获得维持生活的工资，并且在开始工作之前知晓本人工资金额，以工人能够理解的语言写在劳动合同中。

4.5 Occupational health and safety 职业健康与安全

A.D.R. Group is committed to protecting and promoting the health and safety of its employees and anyone who enters its sphere of influence by complying with health and safety regulations in the countries it operates in.

A.D.R.集团致力于保护和促进其员工和任何进入其影响范围的人的健康和安全，遵守其经营所在国家的健康和安全法规。

The company strives to ensure **work-life balance** to preserve the well-being of employees, guaranteeing appropriate rest periods and listening to their needs.

公司努力确保工作与生活的平衡，以维护员工的福利，保证适当的休息时间并倾听他们的需求。

4.6 Contribute to the respect and development of local communities 促进当地社区的尊重和发展

To this end, A.D.R. Group and all its suppliers and third parties shall respect rights of communities and individuals. Purpose of A.D.R. Group is to respect the human rights of the various communities, including their traditions, customs and cultural heritage.

为此，A.D.R.集团及其所有供应商和第三方应尊重社区和个人的权利。该组织的宗旨是尊重各个社区的人权，包括他们的传统、习俗和文化遗产。

Furthermore, the Group, as well as its suppliers and business partners, seek to avoid, minimize, mitigate and remediate potential negative impacts and risks arising from their activities.

此外，集团及其供应商和业务合作伙伴力求避免、尽量减少、减轻和补救其活动产生的潜在负面影响和风险。

5. Implementation, monitoring and review 执行、监察及审查

This Policy is made accessible to all the recipients via internal and external corporate channels, such as corporate email, the "*Sustainability*" section of the Company website and posted on boards in the production facilities.

本政策可通过公司内部和外部渠道公布，如公司电子邮件、公司网站的"可持续发展"部分，以及张贴在生产设施的公告板上。

Plant managers in each business region are responsible for implementing and monitoring compliance with the values and principles described in this Policy. However, the protection of Human Rights is a shared responsibility between the management of the Group, its employees, and its suppliers, and all the recipients must be committed to promoting these values.

每个业务区域的工厂经理负责实施和监督本政策中所述的价值观和原则的遵守情况。无论如何，保护人权是集团管理层、员工和供应商之间的共同责任，所有接收者都必须致力于促进这些价值观。

This Policy will be periodically updated in its content in line with developments in the applicable laws and standards. Important and relevant inputs for the improvement of this Policy may come from the dialogue with all the stakeholders.

本政策将定期更新其内容，以符合适用法律和标准的最新发展。本政策相关的重要改进基于与所有股东的沟通。

6. Approval 批准

This Policy is presented and approved by the Board of A.D.R. Group and signed by the President .

本政策由 ADR 集团董事会提出并批准，并由董事长签署。

The Board, together with the top management, oversees its implementation and is responsible for ensuring adherence to these commitments, both at the regional and central levels.

董事会与最高管理层一起监督其执行情况，并负责确保在区域和总部各级遵守这些承诺。

Name of the President: Flavio Radrizzani

董事长：弗拉维奥·拉德里扎尼

Signature: