

**HUMAN RIGHTS POLICY**



**INDEX**

1.PURPOSE .....	1
2.Field of Application .....	1
3.References .....	1
4.Definitions .....	1
5.DESRIPTION .....	2
5.1. Child Labor .....	3
5.2. Forced Labor .....	3
5.3. Discrimination.....	3
5.4. Working Hours .....	3
5.5. Appropriate Working Conditions .....	3
5.6. Fair and Dignified Wages .....	3
5.7. Freedom of Association .....	3
5.8. Health and Safety .....	3
5.9. Privacy .....	3
5.10. Training .....	3
5.11. Environment .....	3
6.RESPONSIBILITY FOR DISSEMINATION AND MONITORING .....	4
7.Reporting .....	4

## 1. PURPOSE

The purpose of this document is to define the principles on which Valpharma bases its operations across all its activities, in full compliance with Human Rights as defined in the United Nations' "Universal Declaration of Human Rights" (1948) and the ILO's "Declaration on Fundamental Principles and Rights at Work" (1998).

## 2. SCOPE OF APPLICATION

Valpharma S.p.A.  
Valpharma International S.p.A.  
EuroHolding S.p.A.  
Erbavita S.p.A.

## 3. REFERENCES

Valpharma Environmental Policy  
Valpharma Safety Policy  
Valpharma Supplier Code of Conduct

## 4. DEFINITIONS

- SDGs: The "Sustainable Development Goals" are 17 sustainability objectives adopted by the United Nations in 2015, which inspire the actions of Governments, Civil Society, and Companies. The 17 goals are interconnected and derived from the principle that Sustainable Development must balance social, economic, and environmental criteria.
- CCNL: National Collective Labor Agreement.
- Whistleblowing: Reporting activity carried out by an employee who, in the course of their duties, becomes aware of situations, facts, or circumstances that may suggest that an irregularity or unlawful act has occurred concerning Human Rights issues.

## 5. DESCRIPTION

This policy reiterates and focuses on Valpharma Group's (hereinafter Valpharma) commitment to protecting fundamental human rights, as already expressed in the Code of Ethics, and serves as a specific reference for promoting full respect for Human Rights in the Group's activities. In ensuring respect for this subject, Valpharma operates in accordance with the following international human rights documents:

- The Universal Declaration of Human Rights (United Nations) 1948.
- The European Convention for the Protection of Human Rights and Fundamental Freedoms 1950.
- The Tripartite Declaration of Principles of the ILO (International Labour Organisation) Concerning Multinational Enterprises and Social Policy 1977.
- ILO Declaration on Fundamental Principles and Rights at Work 1998.
- OECD Guidelines for Multinational Enterprises 2000.
- United Nations 2030 Agenda for Sustainable Development 2015.
- United Nations Global Compact 2000.
- Italian Constitution 1948.

Valpharma's commitment to ensuring respect for human rights extends not only within its own operations but also across its supply chain through the signing of the "Valpharma Supplier Code of Conduct." Valpharma expects that the principles set out in this Policy are respected by its suppliers and all participants in the Value Chain.

The principles identified in this Policy align with the following SDGs:

- SDG 3: "Ensure healthy lives and promote well-being for all at all ages."
- SDG 5: "Achieve gender equality and empower all women."
- SDG 8: "Promote sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all."

- SDG 10: “Reduce inequality within and among countries.”
- SDG 13: “Take urgent action to combat climate change and its impacts.”

### **5.1 Child Labor**

Valpharma prohibits the use of child labor as defined in ILO Conventions No. 138 (Minimum Age Convention) and No. 182 (Worst Forms of Child Labor Convention).

In cases where young workers are employed, they must not perform work that is hazardous physically, mentally, or socially, or that interferes with their schooling. Additionally, their health and safety must always be safeguarded by appropriate measures.

### **5.2 Forced Labor**

Valpharma rejects all forms of worker exploitation, including forced or compulsory labor, as well as any form of physical or psychological abuse or coercion, and condemns human trafficking in all its forms.

### **5.3 Discrimination**

Valpharma aims to ensure a work environment free from any form of discrimination, with fair treatment for all its personnel, regardless of any personal characteristics. Discrimination occurs when decisions are made for reasons unrelated to work, such as age, disability, ethnicity, family status, gender, membership in employee representation organizations, physical characteristics, pregnancy, religion, skin color, sexual orientation, or political views.

### **5.4 Working Hours**

Employee working hours must not exceed the maximum established by applicable national laws and ILO standards. Furthermore, Valpharma ensures appropriate compensation for overtime in accordance with applicable laws, regulations, and collective bargaining agreements where applicable.

### **5.5 Appropriate Working Conditions**

Valpharma promotes a work environment based on trust, dialogue, and mutual respect, ensuring the well-being of its workers and a balance between personal and professional life. Every worker is free to express concerns or doubts about activities or projects without fear of retaliation. Additionally, every worker is free to choose to enroll in welfare and pension funds.

### **5.6 Fair and Dignified Wages**

Valpharma is committed to providing fair and dignified wages, ensuring an adequate salary in line with the national CCNL. Valpharma provides clear and transparent information on pay dynamics. Furthermore, it commits to making promotion decisions based solely on skills, experience, and professional potential.

### **5.7 Freedom of Association**

Valpharma guarantees its employees the right to form or join employee representation bodies. It is also open to constructive dialogue with recognized trade unions. Additionally, every worker is free to enroll and participate in political parties or other types of organizations.

### **5.8 Health and Safety**

Valpharma guarantees the health and safety of all its personnel by continuously working to provide and maintain a safe and healthy work environment for all its employees, addressing identified risks, implementing preventive measures, and assessing the effectiveness of such measures with a view to continuous improvement, in full compliance with applicable health and safety regulations.

### **5.9 Privacy**

Valpharma recognizes the importance of ensuring adequate protection for individuals whose personal data is processed and respects the right to privacy for all its stakeholders, whether Valpharma employees or external stakeholders, committing to the correct use of the data and information provided.

### **5.10 Training**

Valpharma is committed to adequately training its employees, ensuring the technical training necessary for performing their business functions and fostering personal growth through internal job rotation opportunities before proceeding with external recruitment.

### **5.1 Environment**

Valpharma is committed to using natural resources responsibly, ensuring minimal environmental impact in the development of its activities. For more details, see the Valpharma Environmental Policy.

## 6. RESPONSIBILITY FOR DISSEMINATION AND MONITORING

Valpharma will disseminate the contents of this Policy through its website and company bulletin board so that it is accessible to internal staff and all external stakeholders.

The responsibility for verifying compliance with principles 3.5, 3.8, and 3.11 lies with the HSE Manager. The responsibility for verifying the remaining principles mentioned above lies with the HR Manager.

Additionally, the Sustainability Department will periodically issue a report summarizing the activities related to the areas described in this Policy.

## 7. REPORTING

All employees can report violations of this policy through the Whistleblowing channel provided by the company. Any employee can submit a report by accessing Valpharma's website homepage, clicking on the "Whistleblowing" link, and using the following connection: <https://valpharma.legalwb.it/>.

### Human Rights

POL/003\_EN

Rev. 001



### VALPHARMA GROUP

Valpharma S.p.A. | Valpharma International S.p.A. | Erba Vita Group S.p.A.

Via Ranco 112, 47899 Serravalle (RSM)

tel. (+378) 0549 900936 – mail. [valpharma@valpharma.com](mailto:valpharma@valpharma.com)