



Alkemy S.p.A.
Human Rights Policy

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1. PURPOSE

Alkemy S.p.A. (hereinafter also the “Company” or “Alkemy”) is an international public company and the parent company of the Alkemy Group (hereinafter also the “Group”), that operates in Italy, Spain, Mexico, USA and the Balkans through its 11 offices located in Milan, Turin, Rome, Naples, Potenza, Cagliari, Rende, Madrid, Belgrade, Mexico City and New York. Across geographies, the Group applies high ethical standards and respect for human rights in business. Enacting the values stated in its Code of Ethics and in its Diversity and Inclusion and Anti-Corruption Policies, Alkemy has developed this Human Rights Policy (hereinafter also the “Policy”) aimed at defining guidelines to eliminate and avoid any form of potential and actual human rights violation within the Group.

Each company of the Group firmly believes that ethical business practices are critical to their long-term success. With the guidance of the People & Culture and HR functions, the Group keeps up on its mission to respecting human rights and adopting responsible business practices.

All principles deployed in the present document are in line with and inspired by the provisions of the Universal Declaration of Human Rights of the United Nations, Fundamental Conventions of the International Labour Organization (hereinafter “ILO”), UN's Global Compact and OECD Guidelines for Multinational Enterprises.

2. RECIPIENTS AND SCOPE OF APPLICATION

This Policy applies to Alkemy S.p.A. and all its subsidiaries and to employees, corporate boards, collaborators, job applicants, contractors and suppliers, and all persons who maintain relations with the Company. The provisions and commitments shall be observed by the Group and are fully supported by its top management.

All the players along the Group's supply chain are encouraged to adopt and comply with the principles stated in the present Policy. Suppliers and contractors' adherence to these principles (and other sustainability principles) is defined within the Supplier Code of Conduct.

3. COMMITMENT

Alkemy Group pledges to respect the human rights of all individuals in the value chain, with a special focus on recognizing, understanding, and mitigating the risk of negative consequences for the most vulnerable categories.

The Group's commitment is based on the ILO's Declaration on Fundamental Principles and Rights at Work, which contains principles respecting fundamental human rights.

REJECTION OF FORCED LABOR AND CHILD LABOR

Inspired by the ILO Convention No. 29 and 105, all companies in the Alkemy Group prohibit any type of coercive, bonded, or compelled labor. These prohibited practices also include human trafficking, threatening workers with severe deprivations, such as withholding passports or other ID documents, food or land or wages, physical violence or sexual abuse, or bonding workers through debts.

The Alkemy Group as a whole opposes all forms of labour exploitation, including child labour. Workers' minimum age is determined by the laws of the nation in which the activities are carried out, nevertheless it shall not be less than the minimum age set¹ by ILO Convention n. 138 and 182. Alkemy and its subsidiaries strive to eliminate child labour also in their supply chain, aiming at guaranteeing children's protection and safety in all operations and facilities, as well as supporting community and government initiatives to safeguard children's rights.

NON-DISCRIMINATION & HARASSMENT

Alkemy Group commits to create a fair, diverse, and inclusive workplace and to ensure that all its employees and collaborators are treated with dignity, respect and fairness at all times, no matter their age, disability, sex, sexual orientation, gender, gender identity, race, colour, nationality, ethnic or national origin, religion or belief, socio-economic context or other status.

As stated in the Diversity & Inclusion Policy, the Group strives to ensure equality of opportunity and treatment in employment and occupation, with the goal of eliminating all forms of discrimination in these areas, influenced by the principles contained in the ILO Convention No. 111.

Alkemy and all of its subsidiaries aim at providing a safe working environment without any form of discrimination, whether direct or indirect, associative or individual. Any form of harassment or violence will not be permitted, and appropriate action will be taken if any episode of harassment occurs.

FREEDOM OF ASSOCIATION

Inspired by the principles contained in the ILO Conventions No. 87, 98, and 154, the Group is committed to guaranteeing an open and positive conversation with its workers and representatives, therefore supports collective bargaining as a means of setting contractual working conditions and controlling the execution of collective agreements.

Alkemy Group is also inspired by the ILO Convention No. 135 in prohibiting any discrimination against workers' representatives in connection with their activities, ensuring proper access to the workplace for union representatives who are not employees, and

¹ The ILO Convention No. 138 "sets the general minimum age for admission to employment or work at 15 years (13 for light work) and the minimum age for hazardous work at 18 (16 under certain strict conditions). It provides for the possibility of initially setting the general minimum age at 14 (12 for light work) where the economy and educational facilities are insufficiently developed". While the ILO Convention No. 182 "defines as a "child" a person under 18 years of age".

remaining neutral regarding employee preference to join, remain with, transfer, or abandon their relationship with a union organization.

RIGHT TO DECENT WORK AND MINIMUM WAGE

Following the principles of ILO Convention No. 122, the Group pursues, as a key priority, an active policy aimed to promote full, productive, and freely chosen employment, regardless of race, colour, sex, religion, political opinion, national extraction, or social origin.

Employees are guaranteed the observance of working hours specified by national laws and industry norms, as well as access to all necessary facilities for a comfortable working environment and vacations according to national legislation.

Alkemy Group provides a fair and equitable compensation for its employees, confirming the compliance to the principles contained in the ILO Conventions No. 100 and 131, as well as respecting of national legislation on salary and any additional emoluments. Employees are entitled to the minimum wage as well as all other benefits that are legally required or agreed upon in their contract and gender equality and equal compensation for male and female employees are guaranteed.

WELL-BEING & WORK-LIFE BALANCE

Alkemy and its subsidiaries are dedicated to fostering and spreading a strong health, safety, and well-being culture across the organization to guarantee that the workplace is free of health and safety risks and to promote work-life balance, dignity, daily and weekly rest periods.

To achieve this goal, the Group provides for flexible working hours and allows for discretion in work scheduling to meet parental needs or other necessities in accordance with business and team's deadlines.

OCCUPATIONAL HEALTH & SAFETY

The Group is committed to preventing risks and ensuring the health and safety of its employees and third parties, complying with health and safety regulations, guaranteeing a safe working environment for all workers and employees.

The Group's objective is to protect its human resources by constantly seeking the necessary synergies not only within the companies, but also with suppliers, companies and customers involved in its activities.

For Alkemy Group, Health and Safety in the workplace is a fundamental issue, as also stated in its Code of Ethics. Improving employee's conduct and increasing company culture in order to prevent accidents and damage that may occur during work is a commitment that Alkemy and its subsidiaries pursue with determination and continuity in order to offer increasingly safe workplaces to its people.

The absence of illness and physical and mental factors influencing health, which are directly connected to safety and hygiene at work, is guaranteed, in compliance with ILO Conventions No. 148, 155, and 176.

EDUCATION & TRAINING

Since the Group recognizes that education and training contribute to maintain and improve employees' long-term employability and ensure competitive advantage.

The Company's approach has always been inspired to the principle of continuous learning, which consists in promoting the ongoing growth of the skills and knowledge of people, allowing them to adapt to the rapid evolution of the digital and technological environment. In addition, all companies within the Alkemy Group stimulate their people to constant training and to the consolidation of soft skills.]

The Group aggregates people with very different professionalism and background and has always promoted a culture of sharing and contamination, raising employees' awareness about conducting corporate activities with respect for human rights, through information and training.

3.1. PRIVACY AND DATA PROTECTION

Alkemy Group undertakes not to disclose personal data and, in general, information relating to its collaborators and third parties, generated, or acquired during commercial operations and to avoid any misuse of this information.

The information, data and knowledge acquired, processed, and managed by collaborators in the course of their work must remain strictly confidential and appropriately protected and cannot be used, communicated or disclosed, either inside or outside Alkemy Group, unless in compliance with legislation and company procedures.

In order to comply with current legislation, Alkemy has also adopted various technical and organizational policies for data protection, including the Data Regulation Policy, the Internal Regulation Policy and the Privacy Policy, in order to guarantee the security of the Company's processes and activities.

4. REPORTING OF VIOLATIONS

All Alkemy Group's employees must behave with impartiality, diligence and fairness and all company activities must be carried out with the utmost honesty, collaboration, moral integrity and professional rigor, in compliance with the laws, procedures and company regulations and in compliance with the Code of Ethics.

All recipients are required and encouraged to report any conduct that does not comply with the principles and rules set forth in the Policy by using the whistleblowing channel available at www.alkemy.integrity.complylog.com. For reporting any alleged breach with reference to the Group Spanish subsidiaries, a dedicated channel has been set up and is available at <https://www.alkemy.es/canal-denuncias/>.

Alkemy Group undertakes to treat each report with confidentiality and to protect the anonymity of the informants, ensuring that they will not be subject to any form of retaliation, in accordance with the legislation in force.

Breaches of this Policy make applicable disciplinary sanctions or measures modulated in relation to their seriousness.

5. APPROVAL AND DIFFUSION

The adoption of this Policy is promoted by Alkemy and its subsidiaries and its diffusion to all addressees and to all persons who maintain relations with the Group, also through specific training and induction sessions.

These Guidelines are also made available on the corporate website, with a view to spreading and promoting further Alkemy's culture of diversity and inclusion, and will be the subject of periodic updating, also on the basis of the results of internal assessments and monitoring actions undertaken.