

20 Issue 2023
23 Human
Rights
Policy






Global Policy (GPL)

Human Rights

Code: GPL.107.23	Issue: 01 (December 2023)
Purpose	Establish a single framework for respect of human rights principles that applies to the De Nora Group, bringing together and complementing what has been said about the protection of human rights in the policies already issued.
What I have to do	Read and apply as required the principles established within this policy.

Sponsor	Chief Executive Officer
Key Content Owner	HR
Other impacted functions	All functions and stakeholders of all Group's companies
References	<p>Internal</p> <ul style="list-style-type: none"> • Code of Ethics; • Suppliers' Code of Ethics; • Parental leave Policy; • Privacy Policy; • Whistleblowing Policy; • Performance Assessment and Salary Review policy <p>External</p> <ul style="list-style-type: none"> • United Nations International Charter of Human Rights; • Universal Declaration of Human Rights; • International Covenant on Civil and political Rights; • International Covenant on Economic, Social and Cultural Rights. • Main ILO (International Labor Organization) Conventions; • United Nations guiding principles on Business and Human Rights; • OECD guidelines; • PRINCIPLES I, II, III, IV, V, VI of THE UN Global Compact signed by Nora; • SA 8000.
Superseded Docs	None
Applicability	All Group's Companies and De Nora personnel
Distribution	All DN Personnel
Approver	<p>Paolo Dellachà Chief Executive Officer</p> 

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Acronyms and definitions

Code of Ethics = Group fundamental policy describing ethical principles, values, expected behaviors, commitment, and actions in support of their implementation, which guides the behavior of De Nora personnel and of anyone acting internally and externally on behalf of or in the name of De Nora.

Forced labor = any work or service that is required of a person under threat of retaliation or sanction and for which the person has not volunteered.

Fair wage = level of salary paid that meets a range of requirements, such as minimum wage, payment of overtime, paid holidays, and which should enable industrial technicians and employees to maintain a standard of living that allows them to sustain themselves and their families.

Gruppo/De Nora = Industrie De Nora Spa and all its subsidiaries.

H&S = Health and Safety

ILO (International Labor Organization) = the United Nations Agency for the World of Labor, which promotes work in conditions of freedom, equality, security and human dignity for men and women.

Personal data = information that identifies or makes a natural person identifiable, directly or indirectly, and which may provide details of his/her characteristics, habits, lifestyle, personal relationships, health status, economic situation, etc.

Wellbeing at work = well-being at work covering all aspects of working life, from the quality and safety of the physical environment to the way workers perceive their work, the organization, environment and climate in the workplace.

Whistleblowing = business compliance tool, through which employees or third parties (e.g. suppliers or customers) may report, in a confidential and secure manner, any wrongdoing they may encounter within the organization.

1. Key principles

De Nora has always believed and has applied to itself and to dealings with its counterparts a high ethical standard. Respect of human rights is thus one of the guiding principles of our activities.

Consequently, De Nora commits to respect, and ensure employees' compliance with, the rights established within this policy, which are in turn inspired by the main international frameworks.

2. Human rights in business activities

2.1 Human Resources Management

FORCED LABOR AND CHILD LABOR

De Nora repudiates and prohibits any kind of coercive or forced labor. These practices also include trafficking of human beings, serious deprivation of workers such as the confiscation of passports or other identity documents, food, land or wages, as well as physical violence or sexual abuse.

De Nora also repudiates the exploitation of labor in all its forms, including child labor. The minimum age of workers is determined by the laws in force in the country in which the activity is carried out; however, it must not be less than the minimum age of fifteen years and workers under the age of eighteen must not be involved in work activities involving exposure to dangerous substances or exhausting conditions, such as long hours or night shifts.

HEALTH AND SAFETY

De Nora promotes the health and safety (H&S) of all personnel and third parties by adopting certified management systems, in accordance with the industry's main regulations, thus providing the Group with the means to prevent accidents and damage to the workplace.

H&S are fundamental issues that De Nora pursues with consistency and decision, as proved by the Code of Ethics and the many proactive initiatives and principles the company has established to protect them.

For this reason, De Nora has developed the motto 'Safety starts with you' as well as specific trainings, with the aim of promoting risk awareness and responsible behavior.

WELLBEING & WORK-LIFE BLEND

De Nora is committed to spreading a strong culture of well-being of its people that goes far beyond mere H&S in the carrying out of work activities, to guarantee risk-free workplaces and to promote the balance between work and private life. In accordance with these objectives, De Nora promotes the respect of working hours laid down by national laws and industry standards. Additionally, regardless of where the work is carried out, it promotes the respect of daily, weekly and where applicable compensatory rest times, as well as the right to have a period of paid leave.

De Nora also strives to ensure that work planning enables its employees to meet their personal and family needs, including by the possibility to opt for 'remote working' in all circumstances where the work organization and needs permit it.

De Nora facilitates parenthood in all the countries where it is based and undertakes to ensure further measures to support parenthood, in addition to and beyond those already provided for by local regulations (e.g. Applicable national or territorial employment contracts). In particular the Parental leave Policy, is applicable since 2018 throughout the Group, outlines the measures introduced in the company to support the parenting needs of its employees.

Moreover, depending on the country and the personnel clusters, De Nora organizes various initiatives aimed at improving well-being. Among these, private health insurance packages, psychological support desks, free flu vaccines, and round tables are locally distributed or organized to facilitate socialization and the exchange of ideas.

Specific internal climate surveys and digital tools are in place to monitor the level of stress and engagement of staff, to define plans for improvement actions.

DISCRIMINATION

The Group recognizes the importance of providing a fair and inclusive working environment that allows all personnel to express their uniqueness and be always treated with respect and fairness, regardless of age, gender, nationality, disability, ethnicity, sexual orientation, religion, political opinion, socio-economic context or other status. This commitment is also manifested through the use of inclusive language in order to guarantee that internal and external communication is respectful of different cultures, accessible to all and non-discriminatory.

De Nora stands for equal treatment opportunities in the recruitment process, as well as in the management of compensation, people development and career opportunities, with the aim of continuing to ensure the absence of any form of discrimination in these areas.

HARASSMENT

Harassment is an offensive and unwanted behavior, expressed by words, gestures, or conducts which can make the victim feeling uncomfortable and distressed.

De Nora repudiates and condemns any form of violence, harassment, threat, intimidation, or abuse, of a discriminatory or sexual nature, which could affect the dignity of people and safety at work. The Group does the utmost to ensure that all of its employees are treated with dignity and respect and therefore forbids whatever form of harassment perpetrated by one of its employees at the expense of another.

TRADE UNION ASSOCIATIONS

De Nora is committed to maintaining an open and positive dialog between its workers and their representatives. All employees are guaranteed the possibility of contacting or joining trade union associations, if present in the country and in the reference places of work.

The Group also promotes collective bargaining, where applicable, as a means of defining contractual working conditions.

De Nora protects the workers' representatives by providing them with the structures and means necessary to conduct trade union activity independently and effectively and condemning any form of discrimination, threat, or intimidation against them.

FAIR PAY

De Nora staff is guaranteed a compensation not lower than the minimum wage established by law if applicable. It is also the Group's firm commitment that all employees have a fair remuneration, which guarantees a decent standard of living for them and their families. De Nora has a Salary Review Policy in place by which it commits to periodically update the salary benchmarks for comparable roles, with the aim of paying each colleague as much as possible, using the market salary median for each role as a reference.

TRAINING AND STAFF DEVELOPMENT

Aware of the advantages of having a motivated and prepared workforce for their long-term employability, De Nora promotes, without exceptions the training and development of its people, by providing them

with the means and knowledge necessary to advance their professional journey and to adapt to the rapid evolution of the professional, digital and technological environment.

In particular, the Group contributes to the consolidation of both technical and soft skills, by means of its proprietary De Nora Academy (DNA) or other internal or external training and development channels and establishes programs that meet specific development, legislative or business needs at Group and local level.

In addition to the on-demand courses available in DNA, there are training, either in person or online, delivered by colleagues or more often by external suppliers, as well as, where applicable, job rotation, mentoring, coaching, assessments dedicated to assessing managerial potential and possible areas of dedicated action.

LOCAL COMMUNITIES

De Nora recognizes the importance of supporting the local communities in which it operates and is committed to protecting and supporting them through dedicated initiatives and projects.

For years, De Nora has been making available its sites for local residents e.g. in the event of emergencies, by providing defibrillators, donating school supplies and food to people in need, and organizing or supporting specific charity activities aligned with their values.

As far as its faculties are concerned De Nora guarantees and sponsors respect for human rights in the local communities of the countries in which it operates. De Nora also promotes the well-being of its stakeholders by committing itself to respecting and protecting the natural environment in which it operates.

De Nora has active partnerships with numerous schools and universities in the territory. Additionally, through the Oronzio and Niccolo De Nora Foundation, it promotes scientific research in the field of electrochemistry, through the awarding of scholarships and other types of support to students.

PRIVACY

In accordance with relevant laws and regulations, De Nora has a number of provisions to ensure the appropriate management of personal and sensitive data as well as computer security.

De Nora guarantees that personal data is only kept for the period strictly necessary and are not disclosed to third parties in the absence of an appropriate basis of legitimacy, in accordance with EU Regulation 679/2016 or General Data Protection Regulation (GDPR). Consequently, to ensure the correct and continuous application of these principles De Nora has appointed a Data Protection Officer (DPO), responsible for managing the designing and monitoring of the data protection programs.

Finally, Industrie De Nora has adopted a Privacy Policy containing the methods of collection and processing of personal data and possible transfers, and the information relating to each user who accesses the Group's website.

Regarding computer security De Nora has established the Cyber Security and ICT Operations function that ensures the necessary guarantees, periodically performs risk analysis and status of the measures adopted, and develops campaigns for boosting the awareness in the company.

2.2 Value Chain Management

The protection of some of the principles and values set out in the Policy is to be extended to third parties in De Nora's supply chain.

In particular, De Nora has prepared a process of evaluation, during the suppliers' qualification phase, of the compliance with some ESG criteria, among which the respect of human rights' principles relating to:

- forced labor and child labor;
- discrimination;

- harassment;
- health and safety of working people.

Current and potential suppliers are also asked to adhere to our Supplier's Code of Ethics, in order to establish or maintain commercial relations with the Group.

3. Roles, responsibilities and monitoring

The organizational model of De Nora identifies and assigns precise responsibilities so that the principles established here are monitored and pursued.

Among others, the Human Resources (HR) function, both at Corporate and Local level, is responsible for the processes of recruiting, people management and development. Additionally, it works with the offices and roles responsible for monitoring the application of the Code of Ethics and all other applicable policies.

De Nora also makes use of Key Performance Indicators (KPIs) which are monitored and reported annually, such as on: Discrimination; percentage of employees in collective agreements; number of accidents in the workplace, promotion of personnel health, hours of training provided; women / men salary ratio; proven complaints regarding breaches of customer privacy and loss of customer data; new suppliers that have been selected using social criteria, etc.

Moreover, De Nora, with respect to the principles stated in this Policy, undertakes to analyze the main potential risks and define remediation actions to be implemented in case such risks occur.

All De Nora personnel are responsible for monitoring the correct application of the behaviors identified here and are required to behave in an impartial and respectful manner in accordance with the laws, procedures and company regulations and to carry out all activities on behalf of the Group with the utmost honesty, cooperation, moral integrity and professional rigor. Any actual or suspected violation of the principles set forth in this policy or any other misconduct related to it must be promptly reported through the channels made available in accordance with the *GPL.93.22 Global Whistleblowing Policy*.

4. Change log

Issue	Change description / reason for Change	Interested Chapters
1 (12.2023)	First version	All