

Company Policy on the Protection of Human Rights

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Introduction

The JAKALA Group (hereinafter "**JAKALA**" or "**Group**") considers it essential for a fair and correct development of the business to focus its attention also on fundamental human rights, the enhancement of the person, the quality of life, the promotion of diversity and equality. The Company Policy on the protection of human rights (hereinafter "**Policy**" or "**Human Rights Policy**") highlights what has already been stated in the Group Code of Ethics, in the Whistleblowing Policy, in the Organization, Management and Control Model and in the Supplier Conduct Policy. This Policy constitutes a duty that commits the Group to promote the protection of human rights for all persons involved in its value chain.

JAKALA respects and actively brings to its Stakeholders the principles provided for by national and international regulations and by the standards described by the most important international organizations, such as:

- The Universal Declaration of Human Rights and subsequent international conventions on civil and political rights and on economic, social and cultural rights.
- The United Nations Conventions on women's rights, on the elimination of all forms of racial discrimination, on the rights of the child, on the rights of persons with disabilities.
- The Declaration on Fundamental Principles and Rights of Labour and the eight Fundamental Conventions of the International Labour Organization (ILO).
- The 2030 Agenda for Sustainable Development adopted on 25 September 2015 by the United Nations General Assembly and its 17 Sustainable Development Goals (SDGs).
- The 2011 UN Guiding Principles on Business and Human Rights deals with risk management of negative human rights consequences related to entrepreneurial activity.
- The Modern Slavery Act of 2015 or the British law on modern slavery.
- The international standard ISO 26001 on Corporate and Organization Social Responsibility (CSR).
- The Conflict Minerals legislation that promotes responsible practices of sourcing minerals from high-risk areas or affected by armed conflict
- The Due Diligence & Corporate Accountability Legislative Report issued by the European Parliament in March 2021.

The objective of this Human Rights Policy is to define, structure and implement a clear approach for the entire JAKALA Group on the subject, which allows to implement a socially responsible monitoring system at every organizational and functional level of the Company.

General Principles

The JAKALA Group adopts an approach aimed at protecting the rights of individuals belonging to its entire value chain, including its own workers, suppliers and partners, migrants, children, persons with disabilities, victims of discrimination, human trafficking and all forms of violence, local communities and customers. JAKALA is committed to combating any form of discrimination on the grounds of gender, age, disability, ethnic, social and geographical affiliation, trade union, language, religion, political or sexual orientation, gender identity, nationality, marital status, within the procedures of recruitment, training, remuneration, awarding and dismissal. The company considers unacceptable any act or behavior that constitutes harassment or violence in the workplace.

Here are the concepts that JAKALA considers fundamental for compliance with the following Policy:

- to guarantee suitable healthy and hygienic working conditions and consistently with the Group policy on worker health and safety, protect the health and safety of workers through the adoption of high health and safety standards in all its activities, with the objective of preventing and eliminating any risks that could compromise the physical and mental integrity and the health of all the subjects with whom it collaborates..
- to develop human capital through the promotion of training initiatives aimed at the professional and cultural growth of its employees and those involved in the Company's activities.
- to promote at all levels the right to free association and collective bargaining and actively engage in combating all forms of abuse or discrimination against individuals engaged in the organization or representation of workers.
- to combat all forms of child labor and not to involve individuals below the minimum standards indicated by the law.
- to deny any form of forced or compulsory labor in all its forms and give workers pay that meets their basic needs and those of their family members who depend on them directly.
- to treat all those who collaborate with JAKALA with dignity and in accordance with this policy to maintain a work environment free from any form of harassment, whether physical, verbal or psychological.
- to support in a structured way initiatives and projects carried out in the area to spread cultural values and promote the right to education of young people with various tools, such as the provision of scholarships, the organization of training courses and the offer of content freely accessible.
- to respect the right to privacy and the protection of data and personal information of all those involved in its activities, with particular attention to customers and in absolute compliance with the regulations in force.

Management and Monitoring

In carrying out its activities, JAKALA pays particular attention to the verification of the rights of workers, migrants, minors, local communities and other vulnerable and / or at risk of discrimination or violence in any form.

JAKALA guarantees compliance with the provisions of the Declarations and Conventions to which it adheres, in its Code of Ethics and in this policy, also through actions and tools that allow to evaluate in a transversal and inclusive way the impacts of the risks and opportunities inherent in its business related to human rights, in all their forms.

Dissemination and Updating

This policy is communicated to all employees, depending on the areas of operation, roles and responsibilities, and is made available on the JAKALA company website to all stakeholders, including collaborators, suppliers and partners, so that there is full awareness and further impetus to the promotion of human rights as an integral part of the JAKALA Group's value system. In this regard, the Group requires all suppliers and partners to accept the Code of Ethics, the Supplier Conduct Policy and the General Principles of this Policy.