

# Human Rights Policy

English version





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# Introduction

**RadiciGroup** recognises that it is a **Group with deep local roots**, yet simultaneously **multinational**. Consequently, it is committed to ensuring that its **values of respect and transparency** are **shared in every part of the world** where its operations extend.

Drawing on **increasing awareness** across **all areas** of its activity and guided by the **principles outlined in the Code of Ethics**, with this document the Group aims to **formally acknowledge and convey to its Stakeholders** its dedication to **upholding Human Rights** – a commitment that already underpins the operations of its companies.

This commitment arises from the **attention to People** that has marked the history of the Group, and is further expressed here. Through this Policy, the Group aims to achieve **enduring, growth in partnership with its Stakeholders**, furtherly fostering a sustainability culture that will steer its future direction.

## Human Rights: a universal concept

On 10 December 1948, the United Nations General Assembly adopted the **Universal Declaration of Human Rights**, the most significant international document on the matter, which asserts that:

*“All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood.” (art. 1)*

All individuals should have the ability to exercise the rights set forth in the Declaration without facing discrimination, as these rights are universal, indivisible, interdependent, and interconnected.

Over time, all the rights set out in the Declaration have been incorporated into legally binding international treaties, which the majority of states have joined.

## RadiciGroup Human Rights Policy

**This Policy** serves as the official document by which the Group **formalises and communicates its dedication to respecting and safeguarding Human Rights**, which are of paramount importance in its business practices.

Its principles are permanently adopted by the Group for the prevention, detection and countering of potential violations of laws and regulatory requirements related to Human Rights within its operations.

## Who is it for?

The RadiciGroup Human Rights Policy is applicable across **all Group Companies** and is primarily directed at:

- the **members of the Board of Directors**, the **Board of Statutory Auditors** and, in general, the **governing bodies** of all RadiciGroup Companies;

- **all individuals who work with the Group Companies**, either **internally or externally**, as **part of the Value Chain**. This includes Employees, Consultants, Intermediaries, business Partners, Agents, Suppliers, Contractors, Subcontractors, Customers and any other parties who engage with the Group.

RadiciGroup requires that the **conduct of its Stakeholders – especially its Employees** – aligns with the guidelines set out in this Policy. The Group commits to **actively spreading awareness of the Policy, ensuring it is understood**, and **overseeing** its proper **implementation**.

## Respect, Equality and Freedom - the key words

**Respect, Equality and Freedom** are the terms that a **representative sample of RadiciGroup employees identified in 2024 as key words in the first of a series of surveys on the topic of Human Rights**. These concepts have steered the Group in the drafting of this Policy and will continue to increasingly inspire its activities.

**RadiciGroup** commits to **formally and substantively upholding** the principles of the “**Universal Declaration of Human Rights**”, as well as adhering to **laws** and key national and international **guidelines** on this and other matters.

The Group also aims to **proactively and continuously promote** the principles of **equality and freedom** that underpin the Universal Declaration, in line with the aspirations of the company’s workforce.

To achieve this, RadiciGroup commits to **evaluating the real and potential impacts of its operations on Human Rights**. The company also commits to carrying out measures to **prevent infringements** by **monitoring** and **mitigating risks**. Moreover, if required, the Group will take corrective and restorative steps to support individuals within or outside the organisation who have experienced, or might experience, a rights violation.

## The main Human Rights covered by the Policy

While fully acknowledging the **significance of all Human Rights in their broadest sense**, as established in the Universal Declaration of Human Rights, **special attention is given, both internally and externally to the Group**, to:

- the **firm rejection of slavery, human trafficking and illegal child labour**;
- the **scrupulous respect of employment contracts** and the freedom of association of Workers;
- **Health and Safety** in the workplace;
- maintaining a **work-life balance**;
- the right to a **fair wage**, commensurate with the quality and quantity of work performed and capable of ensuring decent living conditions;
- the development of an **open, transparent and continuous dialogue** between the **Company and Employees**;
- **respect for all types of diversity and opinion**, in order to cooperate for an increasingly inclusive environment;
- safeguarding a **climate free from harassment and discriminatory practices**;
- **training** and the **development of the individual skills** of its staff;
- **local communities in the countries where RadiciGroup operates**, with activities to **support and uphold such communities**.

## The implementation and monitoring process

To bring the principles of this Policy to life, RadiciGroup, beyond the general commitments previously outlined, **remains committed to the specific “social” goals set out in the sustainability plan “From Earth to Earth”**. In this context, the Group establishes **improvement plans, procedures, actions, indicators** and best practices to guarantee their fulfilment.

RadiciGroup also commits to regularly **monitoring** and **reporting** on the **progress made concerning its goals**, using both **voluntary and legally mandated instruments**. Special attention is dedicated to facilitate the **integration of Human Rights into everyday activities**. This engagement **is extended to the entire Value Chain specifically as for risk analysis and best practices**.

## Whistleblowing system

To actively foster a culture **of legality and uphold Human Rights**, RadiciGroup has made available on its website a procedure and a **reporting portal known as “Whistleblowing”**. This resource is for individuals such as Employees, Customers, Suppliers, business Partners, Consultants and Collaborators who wish to **report misconduct or breaches of the principles and commitments outlined in this Policy**, in addition to what is set out in EU Directive 2019/1937.

Reports must be detailed, meaning they should be based on precise and consistent factual elements. The anonymity and protection of the person making the report are guaranteed and safeguarded in accordance with international principles. Appropriate investigations are carried out to determine the truthfulness and validity of the reports.

## Training initiatives and updates

RadiciGroup is dedicated to enhancing stakeholder awareness about respecting Human Rights through **awareness and training initiatives**. These include **communicating** this Human Rights Policy across all levels and employing the most suitable methods for **information dissemination and stakeholder engagement**, with the Group’s website being a primary channel.

This Policy, while upholding the core principles, **will be reviewed and revised, updated, or amended as required**, for example, **in the event of a substantial change in the Group’s structure, regulatory developments**, to evaluate the present **state of the art of operations, or to implement any new initiatives**.

**This document** and any **updates** will be subject to **review and approval by the Board of Directors of the holding company**.

## Versions

Version 2 - May 2026

## Regulatory framework

- Universal Declaration of Human Rights (UDHR)
- Declaration of the International Labour Organization (ILO)
- OECD Guidelines for Multinational Enterprises
- United Nations Sustainable Development Goals
- United Nations Guiding Principles on Business and Human Rights
- ISO 26000 (Guide to Social Responsibility)



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