



I N S A F E H A N D S

LABOUR PRACTICES AND HUMAN RIGHTS POLICY

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1. Scope

REFLEXX S.p.A. recognises that respect for human rights and the promotion of a fair, safe and inclusive working environment are essential conditions for sustainable growth. This Policy sets out the principles, commitments and implementation procedures applicable to the company's operations and, where relevant, to the supply chain.

2. References

Universal Declaration of Human Rights, United Nations.

ILO Fundamental Conventions, International Labour Organization.

UN Guiding Principles on Business and Human Rights, UNGPs.

UN Global Compact – Ten Principles on human rights, labour, environment and anti-corruption.

Applicable Italian labour laws, the relevant National Collective Bargaining Agreement and regulations on equal opportunities and non-discrimination.

REFLEXX Sustainability Policy, including the value of employees and respect for human rights.

REFLEXX Supplier Code of Conduct.

Italian Legislative Decree No. 24/2023 on whistleblowing and the protection of reporting persons, where applicable.

3. Scope of Application

This Policy applies to:

all employees and collaborators of REFLEXX S.p.A.;

third parties acting on behalf of the company;

suppliers and business partners, through contractual clauses and due diligence activities.

4. Guiding Principles

Respect for human rights across the value chain, with particular attention to global supply chains.

Non-discrimination, equal opportunities and the recognition and enhancement of diversity.

Zero tolerance for any form of modern slavery.

Compliance with laws and international standards.

Health and safety as a fundamental right at work.

Dialogue and participation, including freedom of association and collective bargaining.

Decent work: transparent working conditions, compliant working hours and rest periods, and fair remuneration.

5. Specific Commitments

5.1 Non-discrimination and inclusion

We prohibit any form of direct or indirect discrimination based on gender, age, origin, nationality, language, religion, opinions, disability, sexual orientation, personal circumstances or any other protected characteristic.

We ensure recruitment, development and people management processes based on merit and skills.

We promote a respectful working environment, including through awareness-raising activities.

5.2 Prohibition of child labour

We do not employ persons below the legal minimum working age.

We require suppliers to comply with minimum age requirements and to have document verification systems in place.

Where apprenticeship or internship programmes are in place, we ensure regulatory compliance and protection of young workers.

5.3 Prohibition of forced labour

All workers must be employed on a voluntary basis.

The retention of identity documents, the requirement of deposits or bonds, the imposition of debt bondage or any restriction on freedom of movement are prohibited.

Any form of unethical recruitment, or recruitment through intermediaries imposing fees on workers, is prohibited.

5.4 Prevention of harassment and inappropriate conduct

We do not tolerate harassment, intimidation, bullying or violence.

We handle reports confidentially, promptly and impartially.

5.5 Working hours, rest periods and flexibility

We comply with applicable legislation on working hours, rest periods and holidays.

We promote work-life balance through organisational solutions consistent with job responsibilities and business needs, including flexible working arrangements where compatible.

We support remote working.

5.6 Freedom of association and collective bargaining

We respect the right to form and join trade unions and to bargain collectively, without retaliation or adverse consequences.

We maintain open and constructive dialogue with employees.

5.7 Human rights in the supply chain

We integrate ethical and social aspects into supplier qualification and monitoring activities, including through ESG Assessment questionnaires.

We require respect for human rights and decent work through contractual clauses and documented commitments.

We promote continuous improvement across the supply chain, also in response to the expectations of customers and stakeholders.

6. Implementation Controls — Supply Chain Due Diligence

- supplier qualification: minimum ethical requirements, contractual clauses and acceptance of the Code of Ethics and/or relevant policies;
- assessment and monitoring: ESG Assessment questionnaires, document review and, where appropriate, audits or third-party assessments;
- corrective actions: plans with defined responsibilities and timelines, including closure checks;
- escalation: suspension or termination of the relationship in the event of serious violations or lack of cooperation.

7. Reporting and Protection

REFLEXX S.p.A. provides confidential channels for reports from employees, suppliers and stakeholders, ensuring confidentiality and protection against retaliation. Reports are assessed promptly and managed through an impartial and documented approach.

8. Awareness-Raising

We raise awareness among the functions involved regarding the risks and warning signs of modern slavery. We raise awareness among suppliers and partners regarding the requirements of this Policy and REFLEXX's expectations.

9. Monitoring and Review

- supplier coverage by ESG assessments and/or audits;
- number of non-conformities identified and corrective actions implemented;
- reports received and response times;
- periodic assessment of high-risk countries and sectors and update of related controls.

This Policy is periodically reviewed by Management.

10. Approval

Approved by: **Gianni Isetti – CEO and Amministratore Unico.**

La Direzione Sig. Gianni Isetti

