



SINA

Company Directive

DA42006

HUMAN RIGHTS POLICY

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This document is effective from the date of approval and is valid indefinitely, without prejudice to the issue of amendments and/or supplements or replacement documents.

Changes made since the previous revision are highlighted in red in the text.

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This Human Rights Policy was approved by the Board of Directors of SINA S.p.A. on **March 5, 2021**.

SINA S.p.A. requires the utmost respect for people and for the applicable labor laws, and strongly condemns irregular, forced or compulsory labor, as well as child and juvenile labor, setting as one of its objectives the creation of a working relationship in which respect for the person, their dignity and values is expressly and constantly taken into consideration, avoiding any kind of discrimination.

1 PURPOSE

SINA S.p.A. ("SINA" or the "Company") and its subsidiaries are committed to respecting, protecting and promoting human rights in the conduct of its business activities. In this context, this human rights policy establishes the principles and rules of conduct for the employees and collaborators of SINA S.p.A. in relation to human rights, **also in compliance with the provisions of the SA8000:2014 (Social Accountability) standard.**

SINA S.p.A. aims to avoid, in carrying out its activities, any behavior, act or decision that may cause, or contribute to causing, a negative impact on human rights, and promotes respect for such rights in relations with employees, contractors, business partners and suppliers.

SINA S.p.A. promotes adherence to the principles of this policy by all those who have relations with the Company, paying particular attention to the contexts that present greater risks in the field of human rights.

2 SCOPE AND APPLICATION

This policy applies to SINA S.p.A.; more specifically, "Recipients" are identified as members of the Board of Directors and other Corporate Bodies, employees, collaborators, consultants (including any commercial intermediaries), suppliers (including subcontractors) and business partners of the Company with whom business relations or relationships are established or who, for any reason and regardless of the type of contractual relationship, operate in the name of or on behalf of SINA S.p.A. (the "Recipients").

3 REFERENCES

This policy is applied, together with all the regulations in force in the countries where SINA S.p.A. operates, in addition to all the principles found in the Code of Ethics and Conduct (the "Code of Ethics") and in the Organization, Management and Control Model pursuant to Legislative Decree No. 231/2001 ("Model 231") adopted by the Company and in the current company policies and procedures.

The policy is based on international standards such as the Universal Declaration of Human Rights and the Fundamental Conventions ("Conventions") of the International Labor Organization (ILO), the ILO Declaration on Fundamental Principles and Rights at Work and its Follow-up, the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact Principles and the OECD Guidelines for Multinational Enterprises, **and the SA8000:2014 standard.**

4 DEFINITIONS

Undeclared work (or "off the books"): is work carried out, in whole or in part, without contractual or tax (and, therefore, pension fund and insurance) regularization,

or in violation of the law as it provides, for example, working hours that do not comply with regulations.

Child labor: specifically, in compliance with Convention 138 of the ILO, the term "minors" is used to define individuals who are younger than the age at which they complete compulsory schooling and, in any case, all individuals who are not fifteen years old.

Forced or compulsory labor: in accordance with ILO Convention No. 29 **and the SA8000:2014 standard**, "forced or compulsory labor" is defined as any work or service **that a person has not offered to perform voluntarily and that is performed** under threat of punishment or **retaliation, or that is required as a form of debt payment**.

Indigenous and tribal peoples: in accordance with the definitions in ILO Convention 169, the principle of "Rights of Indigenous and Tribal Peoples" applies:

- To tribal peoples in independent countries whose social, cultural and economic conditions distinguish them from other sections of the national community, and whose status is regulated wholly or partially by their own customs or traditions, or by special laws or regulations;
- To peoples in independent countries who are regarded as indigenous on account of their descent from the populations which inhabited the country, or a geographical region to which the country belongs, at the time of conquest or colonization or the establishment of present state boundaries and who, irrespective of their legal status, retain **some** or all of their own social, economic, cultural and political institutions.

5 SCOPES AND RESPONSIBILITIES

Società Iniziative Nazionali Autostradali S.p.A. ("SINA" or "the Company") requires the utmost respect for people and for the applicable labor laws and strongly condemns irregular, forced or compulsory labor, as well as child and juvenile labor, setting as one of its objectives the creation of a working relationship in which respect for the person, their dignity and values is expressly and constantly taken into consideration, avoiding any kind of discrimination.

6 PRINCIPLES

6.1 Human Resources

6.1.1 Selection and recruitment of personnel and management of the working relationship

SINA S.p.A. condemns any form of discrimination and the use of coercion, deception or lack of transparency in the employee selection and hiring process.

SINA S.p.A. undertakes to manage the working relationship with employees while guaranteeing respect for their dignity and rights as individuals, and to never request, at any stage of the selection and recruitment process, contributions of any kind, nor to keep employees' identity documents for the purpose of holding them against their will.

6.1.2 Child, irregular, forced and compulsory labor

SINA S.p.A. requires the utmost respect for people and applicable labor laws and strongly condemns human trafficking, child, irregular, forced and compulsory labor.

SINA S.p.A. is committed to full compliance with the specific ILO Conventions or, where more stringent, with the labor laws applicable in each of the countries where it operates.

SINA S.p.A. also undertakes to ensure that all employees and collaborators under the age of eighteen work in roles suitable to their age, as defined by ILO Convention No. 182 and the SA 8000:2014 standard.

6.1.3 Occupational health and safety

The health, safety and welfare of employees are of utmost importance to the Company.

SINA S.p.A. undertakes to maintain a safe working environment, free from all forms of violence, harassment or intimidation, and to promote high standards of worker health and safety protection, minimizing worker exposure to risks.

SINA S.p.A. undertakes to ensure that all its operating sites comply with the health and safety legislation of the countries in which they are located and, in any case, to comply with standards in line with international regulations and best practices.

The Company promotes a culture of safety at work by encouraging responsible behavior by all employees and collaborators, also through training and information activities.

SINA S.p.A. undertakes to collaborate with its employees to improve health and safety conditions in the workplace, by, among other things, identifying dangers and solving health and safety issues, adopting all the subsequent necessary precautionary measures.

6.1.4 Diversity and inclusion

The Company recognizes that people are the most important resource for the performance of its activities and is committed to ensuring equal opportunities at every stage of employment, from the selection process to role assignment, from professional growth to the end of the working relationship, avoiding any form of discrimination in employment or occupation and promoting a culture where people recognize the value that a diverse and inclusive workforce entails.

No form of discrimination is tolerated on the basis of ethnicity, race, color, gender, sexual orientation, religion, national origin, age, disability, political opinion, union affiliation, marital status, health status, or any other social status or personal characteristic.

6.1.5 Working hours, salary conditions and benefits

SINA S.p.A. operates in full compliance with local laws and international reference standards as regarding working hours, salary, insurance and social security conditions, overtime work and benefits.

Working hours are established in accordance with local legislation and in full compliance with the relevant ILO conventions and with particular regard, where applicable, to the provisions of national collective bargaining agreements and their additions.

Employees and contractors have at least one day off every week and paid vacation, leave and sick leave.

6.1.6 Freedom of association and collective bargaining

SINA S.p.A. guarantees all its employees, without distinction, the right to form associations and join organizations of their choice without prior authorization.

It is also ensured, where workers choose to do so, that terms and conditions of employment are set through voluntary collective bargaining, in accordance with the provisions of ILO conventions and local legislation of the countries where the Company operates and, where applicable, national collective bargaining agreements and additions.

6.1.7 Privacy

SINA S.p.A. undertakes to respect the privacy of all employees, refraining from disclosing personal data and information to third parties, except within the limits and for the purposes allowed by the applicable legislation, and commits to the correct use of the data and information provided, in compliance with the relevant regulations in force.

6.2 Business partners and suppliers

SINA S.p.A. undertakes not to establish business relations with suppliers who employ irregular, forced, compulsory or child labor or, in general, who do not meet the requirements established by this policy.

6.3 Community

6.3.1 Stakeholder engagement

SINA S.p.A., recognizing its role in the community it operates, undertakes to involve its stakeholders in order to ensure that their requests are heard when conducting its business.

The Company is committed to maintaining, on a regular basis, an open and constructive dialog with stakeholders.

SINA S.p.A. is also committed to creating economic opportunities and promoting the welfare of the communities it operates in through locally relevant initiatives, with particular attention to vulnerable or disadvantaged groups.

6.3.2 Rights of indigenous and tribal peoples

The Company undertakes to respect the rights, culture, traditions and customs of the indigenous and tribal populations that may be present in the countries where SINA S.p.A. operates, paying particular attention to the communities that are most vulnerable due to their economic-social, environmental or other conditions.

6.4 Implementation, control and monitoring

6.4.1 Stakeholder engagement

The Human Rights Policy shall be brought to the attention of all internal and external stakeholders through appropriate communication.

Moreover, SINA S.p.A. reports annually on the activities carried out in the field of human rights promotion in the Sustainability Report, in order to inform and sensitize the interested parties and inform on the results obtained in this field.

Finally, this policy is the subject of dedicated training plans to ensure proper

understanding and compliance.

6.4.2 Reporting violations

All Recipients are required to report any alleged or actual human rights violations they become aware of at work and any other policy (alleged) violations.

To this end, dedicated channels of communication are set up as defined in the Code of Ethics **adopted by** the Company.

The Company will evaluate the reports received and handle them with the utmost confidentiality. Bona fide whistleblowers are protected against any form of retaliation, discrimination or penalization, and in any case the confidentiality of the whistleblower's identity is ensured, without prejudice to legal obligations and the protection of the rights of the Company or of anyone accused wrongly or in bad faith.

6.4.3 Disciplinary system

SINA S.p.A. is committed to identifying, assessing, preventing and mitigating the risks of human rights violations, promptly taking appropriate remedial action should such events occur.

Compliance with this human rights policy is an integral part of the contractual obligations of employees, collaborators and, more generally, of all Recipients.

Any violations will therefore lead to the application of the measures provided for by the applicable regulations and collective bargaining.

Failure to comply with the Policy by external subjects may result in the termination of the contract, assignment or, in general, of the existing working relationship with the Company, as well as, where the conditions exist, compensation for damages.

6.5 Policy approval, dissemination and monitoring

SINA S.p.A. approves this Policy by resolution of the Board of Directors and promotes its adoption by all subsidiaries, which will independently adopt this document by resolution of their administrative bodies and promote its timely adoption by their respective subsidiaries.

SINA S.p.A. and its subsidiaries shall endeavor to encourage companies in which it has a non-controlling interest (including joint ventures) to adopt this document.

Should local law or custom apply higher standards than those set forth in this policy, local law and custom must always apply. If, on the other hand, the policy provides for a more restrictive standard, the latter prevails.

This Human Rights Policy is subject to periodic review whenever national and international regulations, to which reference is made as best practices, are amended or differently interpreted by courts or whenever the need arises.

SINA S.p.A. therefore undertakes to monitor any development, both internal and external, in all the countries it operates in that may affect this human rights policy, and to take any appropriate action, as well as to constantly evaluate its performance with respect to policy and best practices with a view to continuous improvement.