



GLOBAL POLICY on HUMAN RIGHTS



I. PURPOSE

Menarini believes that **respect for human rights** is a **social duty** and a **fundamental requirement for its sustainability**.

It also believes that **respect for the personality** and dignity of each **employee** is essential to developing a **work environment based on mutual trust and loyalty**.

Menarini **promotes** the **development and growth of its employees** and **encourages** the adoption of **responsible corporate behavior**.

In this regard Menarini operates by ensuring conditions and behaviors that encourage **the rights that must be accorded to every person by the mere fact of belonging to humankind**, regardless of the origins, affiliations or places where that person is found.



II. SCOPE

This policy applies to **all employees belonging to the Group's companies and business units**.



III. DEFINITIONS

- **Human right:** this definition means those rights that must be accorded to every person by the mere fact of belonging to humankind, regardless of origins, affiliations or places¹.
- **Forced labor:** this definition means all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily².
- **Child labor:** this definition refers to work activity that deprives children of their childhood, their dignity, and adversely affects their mental and physical development³.

¹ Council of Europe (1950). "European Convention for the Protection of Human Rights and Fundamental Freedoms".

² International Labour Organisation (1930). "Forced Labour Convention".

³ International Labour Organisation (1999). "Worst Forms of Child Labour".



IV. COMMITMENTS

Menarini **promotes the rights provided by the International Framework and commits to observe them** in the conduct of its activities, including the relations with its human resources. Menarini's commitments in the field of human rights are developed across the following themes:

Freedom of association and recognition of the right to collective bargaining

Menarini commits to recognize the **right** of all employees to **form or join any workers' organization** and to ensure that this **choice** is **not subjected to any kind of conditioning or discrimination** based on laws of the different countries.

Rejection of all forms of forced labor

Menarini commits **not to engage in or support any kind of workers' exploitation** resulting in **forced Labor**. The Menarini is also committed to guaranteeing to all employees the right to enter employment and terminate it freely and voluntarily.

Rejection of child labor

Menarini commits **not to engage in or support any forms of child labor** and to support children's development. If employing young workers, Menarini is engaged to ensure they are not assigned tasks that pose risks to their mental, physical, social, or moral well-being, and that do not disrupt their education.

Occupational safety and health obligations

Menarini commits to actively take measures to **minimize the risk of accidents at work or work-related health hazards**. In particular, Menarini commits to guarantee adequate safety standards in setting up and maintaining the workplace; to provide proper protective measures to prevent exposure to chemical, physical, or biological substances; to address excessive physical and mental fatigue, especially due to inappropriate work organization regarding working hours and rest breaks.

Equal treatment in employment

Menarini commits to foster a culture of **inclusion and diversity**, to ensure **fair and transparent treatment** of all its employees and that no one is discriminated against, disfavoured or favoured on the basis of their **personal characteristics**.

For more details, please refer to the Menarini Diversity & Inclusion Policy.

Data Privacy

Menarini recognizes **respect** for the **right to protection of personal data** as a priority and adopts appropriate technical and organizational measures to protect the privacy of its employees and the people with whom it comes into contact.



V. IMPLEMENTATION

V.1. Grievance mechanism

Menarini **encourages reporting any actions or omissions that may violate or encourage violations of the principles stated in this document.**

All reports received are treated fairly by Menarini, reviewed appropriately, and investigated with the utmost confidentiality.

Please refer to the Group Whistleblowing Policy for more details.

V.2. Responsibility

The **Global Head of Human Resources** is responsible for:

- approving this policy and future amendments and/or supplements.

The **Human Resource Department** is responsible for:

- supervising the implementation of this policy and bring it to the attention of employees;
- providing for the periodic updating of this policy;
- providing the BoD and the CEO with an annual report on the topics covered in this policy, both related to our company and to the main market trends;
- coordinating the development of specific programs on human rights;
- providing advice and guidance to employees and coordinating the monitoring of the commitments set out in this policy.

The **Line Managers** are responsible for:

- promoting the creation of a work environment in which human rights are fully respected;
- reporting behavior not in line/or potentially not in line with this policy;
- ensuring that their team are aware of this policy;
- ensuring that the conduct of their team is in line with the principles contained in this policy.

The **Employees** are responsible for:

- familiarizing themselves with this policy and acting in accordance with the principles it contains;
- reporting behavior not in line/or potentially not in line with this policy;
- working in partnership with colleagues to promote a working environment that promotes respect for human rights;
- implementing behavior that cannot harm others in any way and promote respect for human rights.



VI. REFERENCES

VI.1. Internal References

This policy integrates the internal documents already operating within the Group and has been drafted in coherence with them. In detail:

- Menarini HR Manifesto;



- Menarini Human Right Policy;
- Menarini Code of Business Practice;
- Menarini Global Code of Conduct;
- Menarini Whistleblowing Policy.

VI.1. International Framework

In drafting this policy and defining its commitments, Menarini considered the main Laws and Regulations of the countries in which Menarini operates (with particular attention to the EU and US Regulations mentioned below), as well as the Principles and Guidelines issued by the main international organizations. In detail:

Laws and Regulations

- Directive 2023/970: Pay transparency and enforcement mechanisms (EU);
- Equal Pay Act 1963 (EPA) (29 U.S.C., Chapter 8 sec. 206(d)) (United States);
- Directive 2006/54/EC: Equal opportunities and equal treatment (EU);
- Fair Labor Standards Act of 1938 (FLSA) (29 U.S.C., Chapter 8) (United States).

Principles and Guidelines issued by the following international organizations

- ILO Declaration on Fundamental Principles and Rights at Work;
- UN Global Compact;
- Charter of Fundamental Rights of the European Union;
- Universal Declaration of Human Rights;
- Sustainable Development Goals (SDGs);
- ILO Curriculum on Building Modern and Effective Labour Inspection Systems;
- ILO Transforming enterprises through diversity and inclusion;
- OECD Guidelines for Multinational Enterprises.

VII. APPROVAL, COMMUNICATION AND UPDATE OF THE POLICY

This policy, as well as any amendment and/or integration to it, **is approved by the Global Head of Human Resources**, Effective 12/06/2024.

Menarini is committed to disclosing this policy among all employees and all relevant stakeholders.

Menarini monitors the actual implementation of this policy and periodically makes the necessary amendments and/or integrations in accordance with significant changes in the regulatory and organizational context.