

HUMAN RIGHTS POLICY

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POLICY ON HUMAN RIGHTS OF GRUPPO GS RETAIL S.P.A. AND ITS PARENT COMPANY RETAIL GROUP S.P.A. (JOINTLY "GRUPPO GS RETAIL")

1. GENERAL PRINCIPLES

The objective of this document is to publicise the observance and protection of the fundamental rights of the individual, which are basic elements of sustainability for GRUPPO GS RETAIL.

The dignity of and respect for the individual have always been at the base of the culture of the company, which is constantly committed to ensuring the elimination of any infringement found internally.

Respect for the principles contained in this policy, founded on the values and principles of its Code of Ethics, is to be considered an integral part of the duties of all employees.

The policy is valid for all the company's offices.

GRUPPO GS RETAIL observes the international principles for the promotion and protection of Human Rights recognised by the principles of the Global Compact of the United Nations and contained in the Universal Declaration of Human Rights and by the Declaration of the International Labour Organisation (ILO) on fundamental principles and rights at work.

2. OUR COMMITMENT

GRUPPO GS RETAIL monitors the application and observance of its human rights policy and Code of Ethics within its corporate confines and expects that all its staff shall observe its rules, commitments and principles and behave in accordance with the highest ethical standards and in compliance with all applicable laws.

GRUPPO GS RETAIL undertakes and asks its staff¹ to undertake to:

- Condemn every form and type of child labour and not use or support child labour in any way;
- Condemn every form of forced labour, not use it and not support it;
- Ensure a safe workplace, implementing all the measures for preventing accidents and injuries;
- Respect the right of association of workers and their freedom to join trade union organisations;
- Not resort to or support any form of discrimination based on gender, age, sexual orientation, religion, social origin or any other condition that could give rise to discrimination in hiring, remunerating, accessing training, promotion or termination of the employment relationship;
- Respect the right of employees to a fair wage, by fulfilling the contracts entered into and in any case ensuring an adequate wage for the duties performed;

¹ "Staff" are defined to be the officers and everyone working with the Group on the basis of a contractual relationship, even if occasional and temporary, at every level of the organisation

- Observe the laws and industry agreements on working hours, never exceeding the maximum hours allowed by law and ensuring the envisaged holidays and rest periods.

3. SAFEGUARDING HUMAN RESOURCES

Human resources are an essential element for the existence and development of the company, which considers the professionalism and commitment of its employees and staff as essential values for the accomplishment of its goals.

GRUPPO GS RETAIL respects and safeguards the dignity, health, safety and privacy of its employees and staff, informing them, at the time of hiring and following changes to company processes, about their rights as well as any risks that may be involved in the performance of their work.

GRUPPO GS RETAIL, in particular, safeguards the physical and moral integrity of its employees and staff, ensuring work conditions that respect the dignity of the individual, in compliance with current legislation on the health and safety of workers.

GRUPPO GS RETAIL sees that no acts of violence or psychological coercion, or any attitude or behaviour that harms individual dignity are implemented.

4. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

GRUPPO GS RETAIL respects the right of its staff to be adequately represented and to freely join trade unions or similar organisations. GRUPPO GS RETAIL is committed to establishing and maintaining a constructive dialogue with the worker representatives elected by the employees, which is based on mutual respect and the right to collective labour bargaining in compliance with local laws.

5. REMUNERATION AND WORKING HOURS

Within GRUPPO GS RETAIL, remuneration is aligned with the provisions of the law and with market standards. We respect the laws in effect on remuneration, benefits, working hours and overtime.

6. FORCED AND CHILD LABOUR

GRUPPO GS RETAIL refuses to resort to forced and child labour as defined by the ILO declaration on the principles and fundamental rights of labour.

7. IMPARTIALITY AND EQUAL OPPORTUNITIES

One of the basic principles, for creating a positive work environment, is the manner of cooperation among everyone working in and with GRUPPO GS RETAIL.

GRUPPO GS RETAIL is committed to ensuring a positive, constructive and dynamic work environment supporting the heterogeneity of the individuals and their talents, opinions and views, ensuring equal opportunities for everyone on the basis of the principles of impartiality.

GRUPPO GS RETAIL undertakes to avoid any form of discrimination based on sexual gender, race, class, national origin, language, religion, political and philosophical opinions, affiliation and membership of political parties or trade unions, state of health, disability and age.

This commitment applies to every aspect of the employment relationship, including hiring, training, work assignment, promotion, transfer and termination of the employment relationship.

8. POSITIVE WORK ENVIRONMENT

GRUPPO GS RETAIL undertakes to ensure a positive and productive work environment for all staff, ensuring a fair treatment of all employees with equal dignity and respect.

No requests or threats aimed at inducing people to act against the law, against the policy on human rights and against the Code of Ethics are tolerated; any behaviour threatening the safety of people or property or that is potentially violent must be reported immediately.

The behaviour of each employee and staff member shall be compliant with the principles of legality, loyalty, correctness, transparency and professionalism expressed in our regulations as well as in observance of the rules of the policy on human rights and of the Code of Ethics, legislation and contractual regulations governing the employment relationship with GRUPPO GS RETAIL and company procedures.

9. PRACTICES FOR A SAFE AND HEALTHY ENVIRONMENT

GRUPPO GS RETAIL undertakes to provide a healthy and safe work environment that is friendly to the environment and in compliance with all the regulations protecting the safety of workers and of the environment.

We are committed to ensuring each staff member pays the utmost attention to hazard prevention in order to avoid accidents and injury, observing all the health and safety regulations and practices relating to their work and taking all the necessary precautions to protect themselves and staff.

GRUPPO GS RETAIL is committed to ensuring that all local laws on health and safety are strictly observed.

GRUPPO GS RETAIL has established a health and safety service, as contemplated by the law, and, pursuant to article 17, letter b, subsection 4 of T.U.S. (the Italian law on health and safety at the workplace), has appointed a health and safety officer (HSO) who has the envisaged requirements of professionalism, experience and training.

The specific attributes and expertise of the HSO, designated by the employer to which they report and whose service the employer uses, consist in coordinating the health and safety service, whose tasks in particular are expressed in:

- identifying the risk factors, assessing the risks and identifying the safety measures and the healthiness of the work environments, in accordance with current legislation, on the basis of the specific knowledge of the corporate organisation;
- developing, to the extent of their responsibilities, the health and safety measures that follow the risk assessment (RAD) and the control systems for these measures;
- developing safety procedures for the various corporate activities;
- proposing worker information and training programmes;
- taking part in consultation on occupational health and safety, as well as in regular annual meetings on safety;
- providing workers with information:
 - on the risks for health and safety at the workplace connected with the company business in general;
 - on procedures for first aid, fire fighting and evacuation concerning the names of the workers assigned to first aid and fire prevention and the company doctor.

10. SELECTING EMPLOYEES AND CONTRACT STAFF

Personnel to be hired are assessed based on matching candidate profiles with the expected profiles and company needs, in observance of equal opportunities for all the parties involved.

The required information is strictly connected to verifying the aspects contemplated by the professional and aptitude profile, in observance of the candidate's private sphere and opinions.

Grandi Stazioni Retail, within the limits of the available information and implementing a specific selection procedure, takes appropriate measures to avoid favouritism, nepotism or cronyism in the phases of selecting and hiring (for example, avoiding ties of kinship or marriage between the candidate and the company's employees).

When signing contracts with employees and staff, GRUPPO GS RETAIL complies with the regulations established by the applicable regulations and collective labour bargaining in effect.

11. SURVEILLANCE AND PREVENTION OF INFRINGEMENTS

Reporting on the subject of human rights is managed in conformity with the Code of Ethics, which envisages a specific procedure for monitoring its application.

12. REPORTING INFRINGEMENTS

Any employee or staff who become aware of a suspected or known infringement of this policy or of the laws on the subject must report it immediately, even in an anonymous form, through the following channel: "whistleblowing platform" through the following link <https://whistleblowersoftware.com/secure/grandistazioniretail-retailgroup> or QRCode





GRUPPO GS RETAIL guarantees confidentiality of the sources and information of which it comes into possession, honouring legal requirements. The Group tolerates no form of retaliation against anyone reporting in good faith or anyone who has refused to perform actions contrary to this document or other company policies, even when as a result of such refusal there have been negative consequences for the business.

Rome, 15 January 2024

GRUPPO GS RETAIL