

# GROUP POLICY FOR THE PROTECTION OF HUMAN RIGHTS

Approved by the Board of Directors on 13 December 2018

## **Poste Italiane Group's commitment to respect for human rights**

Poste Italiane Group is conscious of the fact that it plays a prominent role for the country and, therefore, is strongly committed to safeguarding the well-being of its employees, of the people who work for it, in any capacity, of its stakeholders and of the community at large.

In recent years, a new awareness has emerged of the “social” dimension of corporate sustainability, focusing on human rights, personal development, quality of life, and promoting diversity and equality. Today, it has become absolutely necessary to affirm and respect these rights as a fundamental element of the fair and responsible management of economic activities.

This Policy aims to support and strengthen the Ethical Code adopted by the Group and constitutes a springboard for promoting the protection of human rights of all the people engaged in its value chain. Although the Group operates predominantly in Italy, where the fundamental human rights are protected by the overall regulatory framework, the Group nevertheless undertakes to respect and actively disseminate the principles established by the regulations and standards issued by the international organizations, including:

- the Universal Declaration of Human Rights and subsequent international conventions on civil and political rights and economic, social and cultural rights;
- the UN Conventions on the Rights of Women, on the Elimination of All Forms of Racial Discrimination, on the Rights of the Child, on the Rights of Persons with Disabilities;
- the Declaration on Fundamental Principles and Rights at Work and the eight fundamental Conventions of the International Labour Organization (ILO);
- the 2030 Agenda for Sustainable Development, adopted on 25 September 2015 by the United Nations General Assembly, and the related 17 Sustainable Development Goals (SDGs).

It also represents a key framework for the Company's commitment to operate with a view to achieving the objectives and standards set out in the National Action Plan on “Enterprise and Human Rights”, by the Interdepartmental Committee on Human Rights established by the Ministry of Foreign Affairs and adopted by the Italian Government.

The objective of the Policy is to define, structure and develop a clear approach on the subject, broader than provided for under the law, in order to monitor and manage the risks and opportunities related to all forms of human rights, through the systematic application, at all the Company's organisational and functional levels, also confirming its commitment to pursue investment and management activities centred on social responsibility. The integration of these principles of respect for human rights in the Group's investment processes aims to generate long-term sustainable economic returns and to achieve better risk management.

### **General principles**

Based on the wide-ranging “accountability” demanded by globalisation, the Company staunchly promotes the same principles both internally and externally, with regard to all stakeholders (including suppliers and, generally speaking, partners), also through a constant collaboration with the national and local institutions, proactively supporting the signing of memorandums of understanding and statements affirming the protection of human rights, as well as all forms of permanent structured dialogue and shared participation

with all stakeholders, capable of ensuring, also within the local communities and in a uniform way, their proactive involvement in their respective areas competence.

The approach adopted by Poste Italiane aims to protect the rights of all the persons engaged in its value chain, including freelancers, suppliers and partners, migrants, children, disabled persons, the victims of discrimination, of human trafficking and any form of violence, the local communities and customers.

### **Respect for the rights of Group employees, suppliers and partners**

- **Non-discrimination:** Poste Italiane is committed to combating any form of discrimination based on gender, age, disability, race, social and geographical origin, trade union membership, language, religion, political or sexual orientation, gender identity, nationality, marital status, in relation to its recruitment, hiring, training, remuneration, rewarding and dismissal procedures.
- **Fair and just working conditions:** Poste Italiane considers any form of harassment, sexism and any type of sexual violence at work as wrong and completely unacceptable. The Group guarantees conditions of equal pay and apply the minimum wage requirements set by the collective agreements and relevant regulations, proactively promoting policies for preventing and combating the gender gap and supporting the employment of people with disabilities. To this end, the Group makes sure that overtime work is remunerated according to the law and the local customs, collective labour agreements or industry standards.
- **Health and safety at work:** Poste Italiane is committed to promoting a corporate culture that ensures suitable healthy and hygienic working conditions. Furthermore, consistently with the Group's occupational health and safety policy, Poste Italiane is committed to protecting the health and safety of its employees by adopting high health and safety standards, in order to prevent any risks that could impair the physical integrity and health of all the persons the Company interacts with.
- **Culture and skills:** Poste Italiane is committed to promoting the development of its human capital by implementing specific training initiatives aimed at enhancing the professional skills and culture of its employees and other persons engaged in the Company's operations.
- **Freedom of association and collective bargaining:** Poste Italiane recognises and promotes the freedom of association and collective bargaining at all levels, and the Group is actively committed to combating any form of abuse or discrimination against the persons engaged in trade union activities.
- **Combating child and forced labour:** Poste Italiane does not tolerate any form of child labour and, therefore, does not employ persons aged below the minimum mandatory age according to local law. Furthermore, the Company proactively opposes any form of forced or compulsory labour.

### **Support for the rights of local communities**

- **Accessibility and inclusion:** Poste Italiane is committed to providing its products and services to different groups of people, and, through its widespread network, to reach the geographical areas and populations without direct access to those products and services by reason of their personal circumstances or physical conditions. The Group displays the same commitment in developing products that can create economic value for the Company, while at the same time responding to the social needs expressed by the population living in remote, peripheral or otherwise disadvantaged or socially deprived areas.
- **Culture and education:** Poste Italiane provides structured support to actions and projects carried out within the local communities and aimed at disseminating cultural values and promoting the right to education of young people through a range of different means, such as scholarships, training programmes and offering free contents.

- **Economic sustainability and social connection:** Poste Italiane, in implementing the principles of subsidiarity and integrated sustainability, collaborates on an ongoing basis with the central government and local authorities, the third sector and local communities to address and tackle the needs caused by economic disadvantage or social fragility, also as a result of natural disasters, making available to the communities its own volunteer network and financial and other resources and technology that can alleviate their conditions and speed up recovery.

### **Respect for customer rights**

- **Privacy:** Poste Italiane is committed to respecting the right to privacy and personal data protection of all the persons involved in their activities, with a special focus on its customers and in accordance with the applicable regulations.

### **Management and Monitoring**

Poste Italiane monitors the effectiveness of its approach primarily through dedicated tools, consisting in procedures for identifying and periodically assessing the risks both inside and outside the Group, a system for reporting any violations (whistleblowing), a system of sanctions and dialogue with the stakeholders.

The Company, in accordance with its guidelines on sustainability, integrates human rights into the Group-wide risk management model, thanks to which it can provide for their periodical monitoring (at least once a year), based on specific measurements, and then define action plans which are integrated, to all intents and purposes, within the broader corporate sustainability strategy, capable of strengthening the tools envisaged by the internal control system and ensuring the highest level of protection of human rights. In carrying out these activities, Poste Italiane pays particular attention to ensuring the rights of workers, migrants, minors, local communities and other vulnerable groups and / or at risk of discrimination or violence in any form.

In particular, the Group's risk management model aims to:

- identify any activities or areas within the Company and its organisation at risk of breaches to human rights, by applying risk assessment procedures;
- identify any suppliers and partners who may pose human rights related risks, based on multidimensional profiling that takes into account such factors as: governance, reputation, type of activities carried out and geographical areas of operation;
- assesses the risks identified in terms of their impact and likelihood, on the basis of specific measurements, as well as the adequacy of the mitigation measures and remedies adopted in relation to the identified risks;
- carry out checks in the areas identified as being at greater risk, both within the Group and with respect to suppliers and partners;
- define prevention and mitigation action plans, also shared with suppliers and partners, which may include activities aimed at extending, reviewing, and strengthening procedures and controls, as well as specific training and awareness-raising actions on human rights.

In order to disseminate its principles outside the Group as well, the Company requires its suppliers and partners to accept its Code of Ethics and the General Principles of this Policy; furthermore, the Group requires the parties most at risk to implement specific measures in this respect.

Listening to and engaging in permanent dialogue with stakeholders also constitutes a valid system for monitoring and managing human rights. In accordance with its Code of Ethics, Poste Italiane makes available, in the Group's official website, whistleblowing tools, with a view to unveiling any anomalous or allegedly illegal situations, consistently protecting the whistleblowers' identity, in accordance with the

applicable regulations. Whistleblowing reports are examined by an Ethics Committee which, after having made sure that the reports and accusations are relevant and corroborated, submits the cases to the attention of the competent company function or corporate bodies, which must then decide whether to initiate legal proceedings or adopt the measures provided by the law or the relevant contracts. Finally, the Company periodically (at least once a year) organises specific stakeholder engagement activities, to identify any problems and find the best solutions in a shared way.

### **Reporting**

Poste Italiane reports on the performance achieved in protecting human rights, in terms of management and monitoring methods, identified risks, results of assessment and monitoring activities and management and mitigation actions, through public company documents made available to stakeholders on the company website.

### **Dissemination and Updates**

This policy is disseminated among all employees, also through dedicated and specific training sessions, tailored to the areas of operation, roles and responsibilities, and is made available on the Poste Italiane website to all the stakeholders, including freelance collaborators, suppliers and partners, to ensure full awareness and further impetus to the promotion of human rights as an integral part of the Group's value system.

This policy is reviewed for updating at least once a year, in light of the results of the assessments and monitoring activities, the national and international trends in the protection and promotion of fundamental rights, including second and third generation rights.