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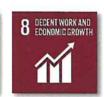
# **HUMAN RIGHTS POLICY**















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### 1. Introduction

IGOR S.r.l. and its subsidiaries (collectively "IGOR" or the "Group"), a long-established leader in Gorgonzola PDO (Protected Designation of Origin) production, upholds the fundamental principle of human rights protection throughout all aspects of its business operations. The Group firmly believes that the true value of a company lies in its people.

With this Human Rights Policy (hereinafter, the 'Policy' or the 'Document'), the Group affirms its commitment to unconditionally respect of the rights of every individual involved in the production cycle, from raw material sourcing to finished product distribution.

In accordance with international standards, including the Universal Declaration of Human Rights and International Labour Organisation (ILO) conventions, and in alignment with its Code of Ethics and Responsible Sourcing Policy, the Group conducts all operations with unwavering respect for the dignity and rights of every individual involved. \This commitment extends beyond direct employees to encompass suppliers and strategic partners, ensuring the promotion of equivalent high ethical standards throughout the supply chain.

The values that guide the Group - Passion, Tradition, Excellence, Innovation and Social Responsibility - are closely linked to the companies' approach to human rights. The **passion** with which IGOR produces Gorgonzola PDO is reflected in the respect for each person involved in the production process. **Tradition**, which safeguards our time-honoured recipe, operates in harmony with a corporate culture that values and respects each individual. **Excellence**, pursued not only in product quality, but also in compliance with high ethical and social standards, drives every operation. **Innovation** drives continuous improvement, thereby ensuring a safe working environment that respects the rights of all. Finally, **Social Responsibility** takes the form of initiatives that promote inclusiveness and well-being for local communities and society.

With this Policy, IGOR reaffirms its desire to ensure that each stage of its operations respects the fundamental principles of dignity and human rights, to build an ethical and



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sustainable supply chain that reflects the company's values and contributes to the wellbeing of local communities and society as a whole. The Policy not only formalises the position of the Igor Group but also marks an ongoing commitment to improve and evolve, pursuing high ethical standards in every activity and respecting every person involved in the production cycle.

### Recipients and Scope of Application

The scope of application of this Human Rights Policy includes, without limitation, the entire Igor Group, comprising the company IGOR S.r.l., its subsidiaries, and all associated offices and operating structures.

The Policy encompasses all natural and legal persons, regardless of their role or relationship with the IGOR Group, who share the collective responsibility for ensuring and safeguarding human rights.

In particular, the Recipients of this Policy are:

- Employees: Every person working within the Igor Group, at any level, is called upon to contribute to the observance and promotion of the principles contained in this Policy in their daily work.
- Suppliers and Business Partners: The companies and individuals who partner with IGOR in providing goods and services constitute essential links in our ethical chain and are expected to uphold the same principles of human dignity and rights that govern the Group's operations.
- Local Communities: The individuals and communities in regions where IGOR operates, who may be impacted by our activities, fall within the Group's sphere of responsibility and commitment to their welfare;

Clients: Customers who select IGOR products participate in a journey that embodies the Group's dedication to ethical practices and human rights protection.



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In addition, all stakeholders working with IGOR in pursuit of the corporate objectives share in this commitment, including:

- Directors and Auditors: Individuals in corporate governance positions, whose conduct must exemplify and align with the principles set forth in this Policy.
- Managers, Associates and External Consultants: All individuals collaborating with IGOR, whether as consultants or temporary partners, form part of the Group's commitment to human rights.

All these persons, as well as groups, organisations and institutions which may be directly or indirectly affected by IGOR's operations, are collectively referred to as 'Recipients.' IGOR believes that every part of the value chain has a role in promoting ethical practices and is committed to ensuring that this responsibility is shared and disseminated. Under no circumstances may the pursuit of corporate interests justify conduct that violates the principles of this Policy. For IGOR, all success and growth must be based on the unwavering respect for the dignity and fundamental rights of individuals, at every stage of their activities.

## Policy Objectives, Internal Policies, International Standards and References

The primary purpose of this Policy is to prevent any negative effect on Human Rights and to ensure that every IGOR operation uphold fundamental human rights of people in every aspect, across all geographical locations where the Group operates or may operate in the future. This commitment is not limited to the prevention of violations, but involves the promotion and protection of human rights, both within and outside the organisation. The Policy establishes guidelines for the protection of human rights, encompassing not only for employees and direct collaborators, but extending to all stakeholders involved in our business operations. IGOR firmly believes that a responsible business must ensure that every stage of its value chain respects the dignity and rights of all people, from field to fork.



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IGOR's approach is mainly based on prevention. The Group prioritizes the prevention of any human rights violations, while maintaining readiness to implement immediate corrective measures should any issues emerge. IGOR is committed not only to preventing direct harm, but also to promoting **awareness**, **training** and the integration of human rights into everyday business decisions.

To ensure the effectiveness of this Policy, IGOR draws on a set of established and recognised international standards, which form the basis of its commitment to human rights, including:

- The Universal Declaration of Human Rights (UN), which establishes the fundamental rights of every individual, without distinction<sup>1</sup>;
- The UN Guidelines for Business and Human Rights, which provide a framework for companies in relation to their responsibility to respect human rights<sup>2</sup>;
- The International Labour Organisation (ILO) Conventions, which address
  workers' rights, including those concerning freedom of association, nondiscrimination and safe and decent working conditions<sup>3</sup>;
- The Charter of Fundamental Rights of the European Union, which guarantees respect for civil, political, economic and social rights in all activities involving EU citizens<sup>4</sup>.

Universal Declaration of Human Rights | OHCHR

<sup>&</sup>lt;sup>2</sup> Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework | OHCHR

<sup>3</sup> Conventions and protocols

<sup>4</sup> Charter of Fundamental Rights of the European Union | EUR-Lex



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# 2. The Main Topics in Human Rights Matters

In accordance with international standards, IGOR prioritizes its commitment based on the **key potential human rights risks** identified within its operational scope. These represent IGOR's most significant concerns, identified based on our operational activities, the diverse contexts in which we operate or may operate, and guidance from international authorities such as the International Trade Union Confederation's (ITUC) Global Rights Index<sup>5</sup>, the UN Human Rights Recommendations (UHR)<sup>6</sup> and Human Rights Watch's 'World Report 2024'<sup>7</sup>.

The Igor Group is committed to preventing and mitigating major negative impacts on human rights across its operations and value chain, with the aim of protecting people and reducing the associated risks for the Group. IGOR aims to prevent the following human rights violations:

- 1. Working conditions and workers' rights
- 2. Discrimination and violation of equality rights
- 3. Freedom of association and trade union rights
- 4. Access to decent working conditions for migrants
- 5. Forced labour and child labour
- 6. Economic, Social and Cultural Rights and Civil and Political Rights of Local Communities

In addition to the specific issues addressed, IGOR reaffirms its commitment to cross-cutting issues that it considers fundamental, as highlighted in the next section entitled 'General Principles'. The company actively promotes these principles and requires strict compliance with them internally as well as externally. These principles, subject to periodic review, are divided into two main categories: (i) Employees and Value Chain Workers, (ii) Local Communities, and are described in more detail in the next section. IGOR takes a proactive approach to monitoring and addressing these issues, with the aim of minimising negative impacts and risks related to human rights, through responsible policies, processes and business practices.

<sup>5 2024</sup>\_ituc\_global\_rights\_index\_en.pdf

Browse Human Rights Recommendations - UHRI

<sup>7</sup> World Report 2024: Italy | Human Rights Watch



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## 3. General Principles

### **Employees and Value Chain Workers**

### **Decent Working Conditions**

IGOR is committed to ensuring full respect of human rights for all workers, whether they are direct employees or involved along the value chain. Every working environment must be founded on principles of dignity, equality and safety, promoting conditions that respect people's physical and mental health. The Group recognises the importance of fair wages, adequate working hours and effective safety measures as basic workers' rights. IGOR not only applies these standards internally but also requires that partners and suppliers adhere to the same ethical principles, ensuring that human rights are respected throughout the value chain at every stage of production and distribution. This commitment stems from our firm conviction that human rights protection and respect serve not only as a moral imperative but as a fundamental cornerstone of sustainable business development.

### Non-discrimination, equal treatment and opportunities for all

IGOR places **respect for diversity**, **inclusion** and **equal treatment** for all, regardless of ethnicity, sexual orientation, gender identity, disability or other personal characteristics, at the heart of its corporate culture. IGOR **firmly rejects all forms of discrimination** and pledges to maintain an environment where professional advancement is determined solely by merit, talent, and demonstrated capabilities. Gender equality and equal compensation for equivalent work stand as fundamental principles of this vision. Moreover, IGOR requires its partners and suppliers to implement equal opportunity policies, while promoting ongoing training throughout the value chain to enhance skill development and inclusivity.



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### Active Participation and Social Dialogue

IGOR believes in the value of open dialogue between employers and employees as a means of improving business practices and promoting shared and inclusive decision-making. Respecting **freedom of association** and the **right to active participation** in company decisions is crucial, as is supporting **collective bargaining to protect workers' rights**. IGOR urges its partners and suppliers to respect this principle, adopting practices that promote an open and transparent dialogue, in which workers' rights are always protected.

## Prohibition of Forced Labour, Child Labour and any form of Violence

IGOR firmly condemns all forms of **forced labour**, **child labour** and **violence** and undertakes to ensure that no employee or associate, whether directly or indirectly involved in its activities, is subjected to conditions of forced labour or exploitation. IGOR expects all partners and suppliers to adopt strict policies to prevent forced and child labour, promoting a working environment that respects the dignity and freedom of individuals, while prohibiting all forms of violence, whether physical, psychological, sexual or verbal. All partnerships must be founded on the protection of people's fundamental rights, ensuring that child and forced labour are eliminated from every segment of the value chain.



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### **Local Communities**

### Economic, Social and Cultural Rights of Communities

IGOR recognises the importance of the economic, social and cultural rights of the communities in which it operates and is actively committed to upholding them. The company seeks to contribute positively to the **well-being of local communities** by supporting projects that facilitate access to decent work opportunities, training and development, and the improvement of social and cultural conditions. The promotion of social inclusion and economic self-sufficiency is central to IGOR's corporate policies, which are committed to creating a positive and lasting impact.

### Civil and Political Rights of Communities

IGOR is committed to respecting and upholding the civil and political rights of the communities with which it interacts. The company upholds the right of every individual to freedom of expression, political participation and non-discrimination, in full compliance with local and international laws that protect fundamental human rights. IGOR encourages social dialogue and civic engagement as a means of fostering harmonious community development.



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# 4. Policy Implementation and Monitoring

To ensure this Policy's proper adherence, implementation, and long-term sustainability, IGOR has established a structured framework designed to maintain continuous human rights compliance throughout the entire value chain, encompassing both internal stakeholders and external partners. The main aspects of the Policy implementation process are described below:

### Responsibilities of Internal Recipients

Adherence to the principles defined in the Human Rights Policy is an integral part of the contractual obligations of all employees and other internal stakeholders. Any violation of the principles contained in the Policy will lead to the enforcement of measures stipulated by applicable legislation and collective bargaining agreements. Department managers bear responsibility for ensuring Policy compliance among all members of their teams, fostering a work environment where human rights are actively protected and respected in daily operations.

### Responsibilities of External Recipients

Suppliers, business partners and all other external parties with whom IGOR has relations are also required to comply with the Human Rights Policy. Should violations occur by these parties, and in the absence of both an adequate impact mitigation plan and cessation of the violation, the Company maintains the right to consider contract termination and ending of the business relationship.

### **Reporting Tools**

IGOR has established a whistle blowing procedure accessible to all Recipients, internal and external, enabling them to **safely and anonymously report** any potential violations of the Policy. This tool is a key component of the implementation process, as it supports a corporate culture based on transparency, accountability and proactivity. The aim is to



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ensure that any violations are promptly detected and handled with the utmost care, protecting human rights across the entire value chain.



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## 5. Policy Dissemination

The **Human Resources** Department is responsible for disseminating the Human Rights Policy within IGOR, ensuring that all employees and associates fully comprehend the principles it contains. The Policy is available to all employees in hard copy format, ensuring easy accessibility and reference. A continuous training program will be implemented to promote comprehensive understanding of human rights and their application in business practices.

All suppliers are informed about the Human Rights Policy through dedicated communication channels and are therefore invited to read and sign the document, confirming their adherence to it. Consent to this Policy is considered a fundamental requirement for establishing and maintaining business relations with the Group.

This Document was approved by the Board of Directors of IGOR on 15 November 2024 and is regularly updated to ensure its compliance with regulations and legal developments. Any revision or amendment is subject to the approval of the BoD to ensure that the content remains current and in line with industry best practices.

Finally, the Policy is publicly available at <u>Gorgonzola DOP Dolce e Piccante | IGOR Gorgonzola Novara</u>to ensure maximum transparency and accessibility to all parties involved. Additionally, to gather stakeholder feedback and suggestions regarding the Policy and to facilitate continuous improvement, all stakeholders are invited to submit their input and recommendations for Policy updates to: giulialeonardi@igornovara.it. The comments and observations received will be carefully considered during the periodic review of the Policy, with the aim of ensuring that the Policy remains current with regulatory changes and continues to accurately reflect IGOR's commitments to human rights.

Signature

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