



PREMIUM BUBBLE SINCE 1938
MADE IN ITALY

Human Rights Policy

Human Rights Policy

Respect for human rights is a core value for Dulcop International Spa. Dulcop believes in sustainable business development, considers respect for human rights and proper adherence to labor rights as an integral part of responsible business behavior; is committed to identifying, preventing and mitigating negative human rights impacts, as a result of or due to its business activities, before or in case they occur, by scrupulously observing human rights and implementing appropriate mitigation measures. Our Labor and Human Rights Policy is subject to the control of the Board of Directors and its proper functioning is verified with the corporate contact person and the Ethics Officers.



Human Rights Policy

The Corporate Policy regarding the safeguard and protection of Human Rights reiterates the rules of conduct to be observed in relations with all stakeholders with whom the Company interacts, as already made explicit within the Code of Ethics. Dulcop pays special attention to safeguarding the rights of all subjects included within the value chain, belonging to specific categories such as: own workers, women, children, indigenous people, migrants, external workers, local communities, suppliers and partners, customers, people with disabilities, people who are victims of any form of discrimination and violence. Through this Policy, Dulcop affirms its commitment to bring its business processes in line with the main international standards and best practices and to promote these principles and report periodically on the performance achieved, in terms of management and monitoring methods, identified risks, management and mitigation actions.



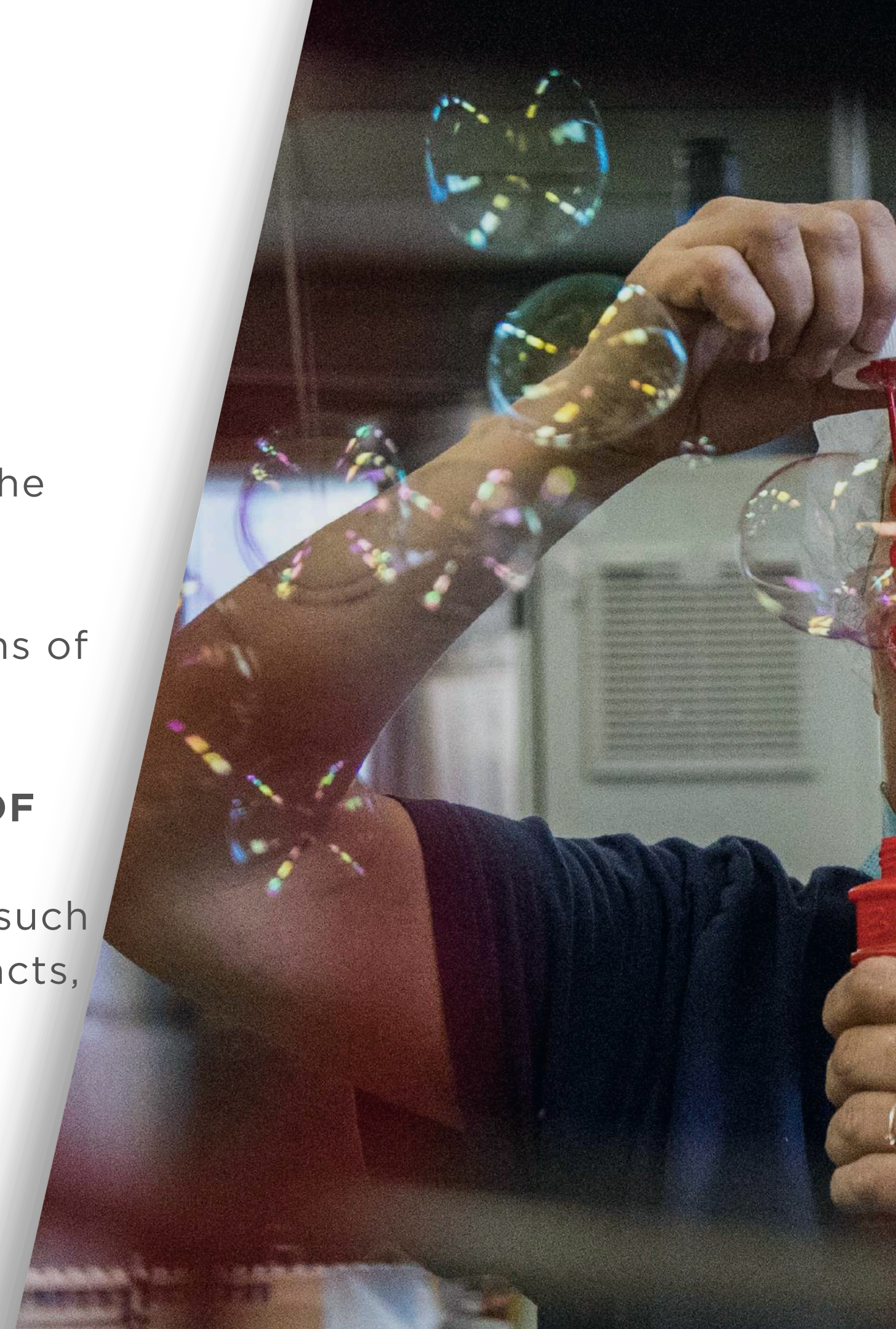
Human Rights Policy

In addition, the Policy regulates different aspects concerning the prevention, condemnation and non-tolerance of any form of harassment (sexual and non-sexual) discrimination or violence, including forced labor, child labor, and human trafficking, while also promoting freedom of association, the right to collective bargaining and fair remuneration in order to support the well-being of the individual. Dulcop verifies through internal audits to employees the situation within the company and the team in order to prevent any occurrence of harassment and discrimination. **ANY FORM OF HARASSMENT OR DISCRIMINATION INSIDE THE COMPANY IS IN NO WAY PERMITTED OR TOLERATED** whether **DIRECT** (on the basis of sex, race, disability, gender, and sexual orientation) **OR INDIRECT** (when it appears to be beneficial to all but because of race, sex or gender it is not) **or resulting from a higher order** (when a person in a position of responsibility or authority gives orders directly or indirectly discriminating against certain groups of people). There is also another type of discrimination, which is that of **VICTIMIZATION** whereby someone is treated wrongly after reporting an unpleasant situation or pushing someone to do so. Discrimination can occur on multiple grounds and touch on multiple topics.

Human Rights Policy

Dulcop ensures that workers are not subject to any form of violence, harassment and inhuman or degrading treatment in the workplace, as well as threats of violence and abuse, including corporal punishment, verbal, physical, sexual, economic or psychological abuse, mental or physical coercion or other forms of harassment or intimidation.

For all **VULNERABLE WORKERS** such as **WOMEN, MEMBERS OF LGBTQ+ COMMUNITIES, FOREIGNERS AND PEOPLE WITH DISABILITIES**, Dulcop provides improved working conditions, such as more flexible hours, more comfortable work stations, contracts, and language courses in the case of foreign workers.



Human Rights Policy

Dulcop has a higher number of WOMEN employees than MEN employees (see **GENDER DISAGGREGATED DATA**): on the production lines we have only WOMEN workers. In case they have children up to 3 years old, they do not work night shifts and do not do strenuous and dangerous work. Regarding chemicals, women do not come into contact with dangerous substances and have all the PPE so that they can be protected in case they have to use them (**DOES NOT APPLY TO PREGNANCY WOMEN**).

The restrooms are equipped with the devices for menstruating women and they all have showers. The locker rooms are all divided by **GENDER**.

With regard to protected categories, all directions of the competent doctor are followed. Dulcop is committed to supporting these vulnerable groups and making work as easy as possible.



Human Rights Policy

ALL WOMEN IN DULCOP MAY PARTICIPATE IN ELECTIONS OF ETHICS REPRESENTATIVES, RUN FOR OFFICE AND PROMOTE THEIR POSITION. IF THERE ARE OTHER OPPORTUNITIES WHERE THEY CAN HOLD POSITIONS OF RESPONSIBILITY AND AUTHORITY WOMEN CAN BE FREELY ELECTED AND EQUALLY FREELY RUN FOR OFFICE.

The same policies are also applied to recruitment agencies or outside companies seeking workers for Dulcop.

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To ensure that outside agencies hire regularly and pay fairly, Dulcop agrees to provide all time cards to outside companies whose then formulate the payroll. Dulcop pays salaries by the 10th of each month directly by bank transfer to all its employees, while the outside companies (**Lavoropiù** pays on the 15th of the month and **Client Solution** pays on the 15th of the month with a 6-day grace period) issue a report invoice summarizing all payments to outside employees with which Dulcop can check the correctness.

Each worker can point out anomalies, which are immediately checked both internally and by the external Payroll Firm (Studio Errigo associate labor consultants), which prepares all documentation based on the hours report that Dulcop sends. Each employee also can check the payment of contributions by logging in with their SPID to the INPS portal. Any payment or deposit is fully traceable and tracked. If there is any anomaly even INPS itself can request an audit.

Human Rights Policy

Regarding the **dismissal** procedure ,
Dulcop, unless there are such reasons to
proceed with an action against it (union
intervention), receives directly via PEC the
resignation letter indicating the last day of
work by the employee. A fairly similar
procedure occurs for **registering** a new
employee: in fact, it can be verified that an
employee is **REGULARLY** hired (same thing
for the resignation procedure) through a
mandatory communication to the regional
labor agency called UNILAV.

**ONLY WITH THIS TYPE OF COMMUNICATION AN
EMPLOYEE IS LEGALLY HIRED.**



The image shows the United Nations flag, which is a blue field with a white emblem in the center. The emblem consists of a world map surrounded by a laurel wreath. The flag is waving and set against a background of a blue sky with white clouds.

Human Rights Policy

This Policy reinforces what has already been stated in the Group's Code of Ethics and constitutes a manifesto that commits the Company to promoting the protection of human rights for all people working in its value chain. Although it operates mainly in Italy, where the legal framework regulates respect for fundamental human rights, Dulcop is committed to respecting and actively disseminating the principles set in the regulations and standards issued by relevant 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 United Nations Conventions on the Rights of Women, the Elimination of All Forms of Racial Discrimination, the Rights of the Child, and the Rights of Persons with Disabilities;
- the Declaration on Fundamental Principles and Rights at Work and the eight Core Conventions of the International Labor Organization (ILO);
- the 2030 Agenda for Sustainable Development adopted on September 25, 2015 by the General Assembly of the United Nations.

Human Rights Policy

The projects and initiatives promoted by Dulcop in order to ensure social inclusion and enhance diversity are part of a broader strategic framework aimed to developing balanced organizational models designed to foster communication and highlight personal characteristics, while protecting individual vulnerability. These initiatives also include the organization of training sessions aimed at the entire corporate population on topics such as, among others, the phenomenon of discrimination and harassment in the workplace in order to raise awareness and increase awareness of issues of extreme actuality and on which particular attention is paid. The path taken aims to evolve from an approach focused exclusively on diversity protection and inclusion, toward a more proactive strategy that aims to overcome barriers and address factors that hinder the employment inclusion of individuals. Dulcop's diversity and inclusion strategy testifies the Company's commitment to creating a collaborative, supportive and open work environment that simultaneously allows it to maximize the opportunities it brings, contributing on the one hand to the well-being of its employees and on the other to its competitive advantage in business.

Human Rights Policy

In order to make the grievance mechanisms easier and usable for everyone, employees can find proper sheets where they can write their complaints or suggestions (both anonymously and non-anonymously) both in the locker room and in the cafeteria; in order to bring out anomalous cases or alleged incidents of discrimination and/or harassment, Dulcop provides suitable systems to receive reports in line with current regulations such as the suggestion box, the presence of two ethics officers and an ethics supervisor. In case of any complaint, Dulcop undertakes to investigate the problem, understand what is going on (all complaints are classified with an identification number) and offers support to those who are discriminated against in some way. At the same time, it investigates the “culprit” trying to understand what led him/her to this attitude and behavior by sensitizing the affected staff through trainings and meetings, promoting diversity and inclusion, equality in opportunities based on meritocracy, and monitoring the whole business process through policy review.

Human Rights Policy

There are 4 forms of GENDER BASED violence that must be condemned and abolished:

1. PHYSICAL (any act that results in a danger to physical health, any deprivation or abolition of liberty)
2. PSYCHOLOGICAL (coercion, defamation, verbal insults or grievances)
3. SEXUAL (any form of sexual, physical, verbal or nonverbal violence)
4. ECONOMIC (deprivation, denial of economic supports or harm)

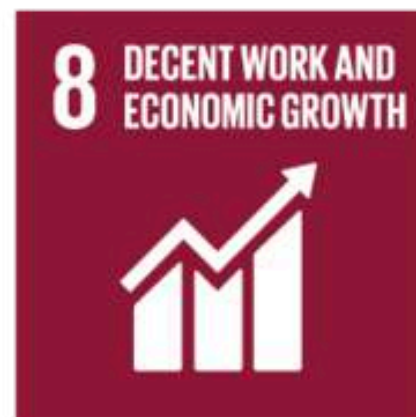


All discrimination and violence based on **GENDER ARE STRICTLY FORBIDDEN AT DULCOP AND REPRESENT A VIOLATION OF HUMAN RIGHTS AS WELL AS A GRAVE ATTACK ON EVERYONE'S DIGNITY.**

Dulcop is committed every day to enforcing these principles on its employees and stakeholders, so that **ALL ARE TREATED IN AN EGUALITARIAN AND DIGNITUOUS MANNER.**

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THE SUSTAINABLE DEVELOPMENT GOALS - UN AGENDA 2030





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Thank you

For any further clarification, please write to
“ethical@dulcop.com”