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BONATTI - Società per Azioni  
Capital Stock € 35,696,792.28 wholly paid-up  
Bus. Reg. Parma No. 02188130153  
R.E.A. No.130274  
N. Meccanografico PR 008484  
VAT No. IT00765080346  
Tax Code No. 02188130153

## HUMAN RIGHTS POLICY STATEMENT

### 1. OUR VISION ON HUMAN RIGHTS

Bonatti's vision on human rights builds on the dignity of every human being and on companies' responsibility to contribute to the well-being of local individuals and communities. Bonatti's approach to human rights is integrated into its mission as an main Contractor that works to build a future where everyone can access energy resources efficiently and sustainably; is committed to long-term partnerships with host countries and communities; and grounds its work in passion and innovation, in the quality and development of its people, and in the recognition that diversity across all aspects of our operations and organisation is always an opportunity and never a limitation. This represents the precondition to help meet the needs connected with economic diversification, education and training, health and access to water, all of which are addressed by means of specific initiatives. Through its "dual flag" cooperation model, Bonatti promotes a fundamental dimension of human development and dignity. This vision goes beyond obtaining a social licence to operate: it is an integral part of Bonatti's identity and its way of doing sustainable business. It also contributes to embedding the Sustainable Development Goals within our host countries' national development plans, in line with the United Nations 2030 Agenda. Within such frameworks, this Statement is focused on Bonatti's specific commitment to respecting human rights. The values and commitments set out in this document represent a core part of Bonatti's heritage and culture, and underpin the business integrity principles included in its Code of Ethics and spread through training and awareness-raising programmes.

### 2. OUR AIM: RESPECT FOR HUMAN RIGHTS

Bonatti is committed to respecting human rights in its own operations and expects its Business Partners to respect the aforementioned rights with regard to the activities assigned to or carried out with them as well as to the activities they may carry out in Bonatti's interests. Bonatti reaffirms its commitment to respect the human rights contained in the International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the other applicable human rights as set out in international Treaties and Standards. Bonatti adheres to the UN Guiding Principles for Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the ten principles of the United Nations Global Compact. As a consequence, Bonatti will avoid infringing on the human rights of others and will address any adverse human rights impacts in which it might be involved. Bonatti



undertakes to ensure that the principles included in this Policy Statement shall be disseminated and implemented at all levels, both in Italy and abroad in every country in which Bonatti operates. The principles and contents of this Statement apply to Bonatti, Bonatti's directors, statutory auditors, managers and employees as well as by all those who operate in Italy and abroad in the achievement of Bonatti's objectives. Furthermore, Bonatti operates in compliance with local laws of the countries where it is present. In the event of obstacles to the implementation of this Statement deriving from divergence between national local laws and its operating standards, Bonatti shall strive to develop alternative measures aimed at promoting respect for human rights.

### 3. OUR SPECIFIC COMMITMENTS

Bonatti is committed to actively cooperating with state authorities and government entities in the implementation of their human rights agenda. Being a major contractor in several countries, Bonatti believes that, by respecting human rights in its activities and relations, Bonatti can give a critical contribution to enhancing access to human rights, also in terms of collective awareness on the importance of these principles. Where necessary, Bonatti shall identify the most effective approaches to express its concern over potential or actual human rights issues in a country of operation. Conscious of the complexity of its business and of the challenges deriving from certain operating environments Bonatti is engaged in a continuous effort to identify potential and actual Human Rights impacts that it may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships. In particular, Bonatti puts the following processes and measures in place to assess and address the most salient human rights issues pertaining to its business and contexts of operation:

- a) Training and awareness raising: Bonatti considers training and awareness-raising activities dedicated to its employees and Business Partners to be a key element of its commitment to respecting human rights. In this context, Bonatti undertakes to disseminate this declaration to all its employees by strengthening the training program already in place.
- b) Human rights in the workplace: Bonatti is committed to respecting the four ILO core labour standards as set out in the Declaration on Fundamental Principles and Rights at Work:
  - Freedom of association and the effective recognition of the right to collective bargaining;
  - The elimination of all forms of forced or compulsory labour;
  - The effective abolition of child labour; and
  - The elimination of all forms of discrimination in respect of employment and occupation.

Furthermore, Bonatti offers a fair remuneration and provides a safe and healthy working environment as well as working conditions in line with international standards. Bonatti provides its workers with access to preventive and curative health services, including emergencies. This healthcare model offers a standardized service in all



operating environments, either through in-house or outsourced services. Bonatti is committed to respecting the ILO Convention n. 135 explicitly banning any discrimination of workers' representatives in connection with their activity, providing for proper access to the workplace for union representatives, other than employees, and remaining neutral concerning employee preference to join and remain with a union organization, as well as transfer or abandon their relationship with such an organization. Any harassment or bullying behaviours in working relationships, either inside or outside the company are forbidden, without exceptions. Bonatti commits to ensuring that third-party companies when working for or together with Bonatti agree to apply the above-described guarantees to their workers, including suitable contractual clauses against possible violations.

- c) Human rights of local individuals and communities: Bonatti respects the rights of individuals and the local communities in which it operates, with particular reference to biodiversity, the rights to ownership and use of land and natural resources, the right to water and the right to the enjoyment of the highest attainable standard of physical and mental health. Moreover, Bonatti operates according to advanced criteria for environmental and public safety protection. Special attention is given to the rights of vulnerable groups, including a focus on children. Bonatti takes human rights issues into account from the very first feasibility evaluation phases of new projects and relevant operational changes. Bonatti carries out assessments on its potential and actual environmental, social, health and human rights impacts with the aim of preventing and mitigating adverse impacts. Bonatti informs and engages local communities by promoting free, prior and informed consultations, with the purpose of considering their legitimate expectations in conceiving and conducting business activities, including community investments. Bonatti designs and implements community grievance mechanisms as part of its efforts to foster dialogue with local communities over project developments and potential impacts. Bonatti is committed to taking action to avoid the resettlement of local communities. In such cases where this cannot be avoided, Bonatti carries out free, prior and informed consultations with the affected people in order to reach joint agreements, fair compensation and improvements to living conditions, in line with the IFC Performance Standards. Bonatti respects the distinctive rights of indigenous peoples, with particular reference to their cultures, life styles, institutions, bonds with their homeland and development models in line with international standards.
- d) Human rights and Security: Bonatti shall manage security activities in accordance with current regulations and international standards, including the United Nations Basic Principles for the Use of Force and Firearms by Law Enforcement Officials and the Voluntary Principles on Security and Human Rights, taking into account the specific needs of the countries where it operates. Bonatti also undertakes to minimize the impact of its security arrangements on local communities and prepares the most effective protection plans and mechanisms for their protection. The use of armed guards is allowed only for the purpose of protection of personnel and assets subject to a security risk. Preventive and defensive measures are designed and implemented to minimize the necessity for active response by state and/or private security forces to threats to personnel and assets. The use of force and firearms is restricted to self-



defence, to prevent the perpetration of a serious life-threat Bonatti incidents and always and only in a manner proportionate to the offence.

- e) Human rights in our business relationships (Business Partners and suppliers): Bonatti takes into account the potential impact on human rights deriving from activities carried out by Business Partners in the management of its business relations and plans specific measures in this regard. Bonatti expects its Business Partners to respect the principles and content of this Statement and makes all reasonable efforts to include contractual obligations to respect human rights into its agreements with them when working for or together with Bonatti. Bonatti shall engage its Business Partners in the prevention and mitigation of any adverse human rights impacts that their operations, products or services might cause, or contribute to or are directly linked to. Bonatti undertakes, as far as possible, to ensure that the principles included in this Statement are integrated into the internal legal framework of the Joint Ventures in which it participates. Where Bonatti's leverage is relatively limited (for instance with non-operated Joint Ventures and in general where Bonatti has a low level of participation), Bonatti will make all reasonable efforts in order to guarantee that the Joint Ventures' policies and practices are fully aligned with the principles included in this Statement.

Anyway, child and forced labour are considered as no go for the Company.

Bonatti ensures that suppliers are aware of Bonatti's commitment to respecting human rights and promotes communication and awareness-raising activities aimed at meeting this goal. Bonatti's suppliers are contractually required to commit to respecting the principles and international standards of human rights, including the Universal Declaration of Human Rights, the UN Global Compact and the Bonatti Code of Ethics, as well as the specific health and safety requirements that Bonatti adopts. Bonatti assesses suppliers on a risk basis and performs processes aimed at preventing human rights impacts deriving from their conduct. Should critical issues emerge, Bonatti requires the implementation of corrective actions and monitors compliance with the commitments undertaken from suppliers over time. Where suppliers' performance on human rights falls below Bonatti's minimum acceptable standards, Bonatti limits or prevents their participation in tenders and terminates the contracts. Aware of the increasing saliency of slavery and human trafficking in global economies, Bonatti is committed to maintaining and improving its practices to identify and combat these human rights violations in its supply chain. Furthermore, Bonatti demands that, in case of subcontracted activities, the latter be carried out in line with the same requirements.

#### 4. HUMAN RIGHTS DUE DILIGENCE

Bonatti is committed to carrying out human rights due diligence in its activities. Bonatti assesses and monitors its human rights potential and actual impacts on an on-going basis and identifies customized strategies and solutions, in an on-going effort to improve prevention and mitigation of its impacts. As part of the integration of human rights into its processes and practices, Bonatti issues specific instructions and delivers focused training to its employees and other awareness-raising initiatives dedicated to contractors and

other Business Partners. Bonatti assesses and monitors the effectiveness of its activities and reports on its performance.

## 5. REMEDY AND GRIEVANCE MECHANISMS

Bonatti is committed to verifying and providing, or cooperating to provide, remediation in case of adverse human rights impacts it might have caused or contributed to, and to make all efforts to promote the achievement of the same goal in cases where the impact is directly linked to its operations, products or services. Grievance mechanisms and other reporting channels, both at operational level and company-wide, are made available to enhance the opportunities for the company to identify and promptly investigate potential and actual human rights impacts and take appropriate action. Furthermore, Bonatti does not prevent access in any way to state-based judicial or non-judicial mechanisms and co-operates in good faith with such mechanisms. Bonatti prohibits, and undertakes to prevent, retaliation against workers and other stakeholders for raising human rights-related concerns, and neither tolerates nor contributes to threats, intimidation, retaliation or attacks (both physical and legal) against human rights defenders and affected stakeholders in relation to its operations.

## 6. PARTICIPATION IN MULTI-STAKEHOLDER INITIATIVES

Bonatti contributes to initiatives, networks and working groups that deal with human rights on a local, national and international level, and develops public – private partnerships concerning these topics.

Parma, 10/01/2022



Chief Executive Officer  
Andrea Colombo