

GROUP POLICY ON HUMAN RIGHTS, DIVERSITY, EQUITY & INCLUSION



INDUSTRIE CELTEX®

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Approved by: Chief Executive Officer

TABLE OF CONTENTS

1	INTRODUCTION AND PURPOSE.....	3
1.1	Overview.....	3
1.2	Scope	3
1.3	Compliance with Local Laws	3
2	GOVERNANCE AND OVERSIGHT	3
2.1	Responsibilities.....	3
2.2	Policy Review, Dissemination, and Training.....	4
3	HUMAN RIGHTS COMMITMENTS	4
3.1	Child Labor	4
3.2	Forced Labor & Human Trafficking.....	4
3.3	Freedom of Association & Collective Bargaining	5
3.4	Fair Wages & Working Hours	5
3.5	Health, Safety & Dignity at Work	5
3.6	Supply Chain Management	5
4	DIVERSITY, EQUITY & INCLUSION STRATEGY	6
4.1	Non-Discrimination	6
4.2	Gender Equality & Pay Equity	6
4.3	Diversity in Recruitment & Advancement	6
4.4	Disability Inclusion	6
5	DATA PRIVACY & PERSONAL INFORMATION PROTECTION	6
5.1	Privacy commitment.....	6
6	GRIEVANCE MECHANISMS & WHISTLEBLOWING.....	7
6.1	Grievance Channels	7
6.2	Investigation & Remediation.....	7
6.3	Retaliation Protection	7
7	DOCUMENT INFORMATION AND APPROVAL	7

1 INTRODUCTION AND PURPOSE

1.1 Overview

Industrie Celta Group ("the Group" or "the Company") is a leading European manufacturer of tissue paper, non-woven fabrics, and professional dispensing systems. With production facilities in Italy, France, Germany, and a warehouse in Spain, the Group serves diverse market segments, including domestic, professional, medical, and aesthetic applications.

The Company is committed to respecting and promoting human rights, fostering diversity, ensuring equity, and building an inclusive workplace across all Group entities globally. This Policy establishes the Company's commitment to:

- Eliminate child labor, forced labor, and all forms of exploitation
- Respect freedom of association and collective bargaining rights
- Ensure fair wages, safe working conditions, and dignity for all workers
- Promote diversity in all its forms (e.g. gender, ethnicity, age ...)
- Zero discrimination and ensure equal opportunity
- Create an inclusive workplace culture where all employees feel valued and respected
- Extend these commitments throughout the supply chain

1.2 Scope

This Policy applies to all Group entities; subsidiaries, and controlled companies worldwide. The Policy covers all employees—whether permanent, temporary, or part-time—as well as contractors, suppliers, vendors, and business partners at all organizational levels.

1.3 Compliance with Local Laws

Compliance with applicable laws and regulations forms the foundation of operations across all jurisdictions where the Company is settled. Local legal requirements vary significantly by country and region, and respect for these requirements is non-negotiable.

The application of standards follows a clear hierarchy: where local legislation exceeds the requirements set forth in this Policy, the stricter legal standard applies. In instances where this Policy establishes higher standards than local law, the Company implements its own requirements to ensure consistent ethical practices throughout the Group.

Regulatory landscapes are dynamic, and the Company maintains continuous monitoring of legislative changes across all operating regions. Through this proactive approach, practices and procedures are adapted promptly to reflect new requirements, demonstrating sustained commitment to responsible business conduct and regulatory excellence.

2 GOVERNANCE AND OVERSIGHT

2.1 Responsibilities

The **Chief Executive Officer (CEO)** approves and oversees this Policy and receives at least every two years reports on human rights and diversity performance. In doing so, the CEO ensures organizational accountability for the Policy's implementation and for any material updates made to it over time.

The **HR Department** is responsible for the day-to-day implementation of this Policy. The Department also handles grievances and investigations, and maintains the confidentiality and documentation these processes require.



Managers and supervisors are expected to model inclusive and respectful behaviour and to ensure compliance with this Policy within their teams, addressing concerns and violations promptly as they arise. They are also responsible for supporting employee development and advancement, and for participating actively in training and awareness programs. More broadly, managers hold particular responsibility for creating a workplace culture where all employees feel valued and included.

All employees are expected to comply with this Policy and to treat all colleagues with respect and dignity. Concerns should be reported through appropriate channels, and employees are expected to participate in training and awareness programs in support of an inclusive workplace culture. Ultimately, each employee is responsible for understanding their own rights and responsibilities under this Policy.

This Policy is further supported by executive management; each of whom monitors alignment between this Policy and the Group's broader ESG strategy and compliance framework within their respective areas of competence.

2.2 Policy Review, Dissemination, and Training

This policy is reviewed and updated every two years to assess its effectiveness and relevance, as well as whenever significant changes occur in the business, operations, or regulatory environment, when stakeholder feedback indicates a need for change, when human rights and DE&I best practices evolve, or when new material risks or opportunities in this area are identified. The **CEO** approves all material changes to the policy.

Once approved, the policy is communicated to all employees, contractors, and business partners. Compliance with the policy is monitored and enforced on a continuous basis.

3 HUMAN RIGHTS COMMITMENTS

3.1 Child Labor

Child labor in any form is strictly prohibited throughout the Company's operations and supply chain. Beyond legal compliance, the Company recognizes the profound harm that child labor inflicts—depriving children of their childhood, disrupting education, and causing lasting damage to physical and mental development.

Employment of individuals below the legal minimum working age is not permitted under any circumstances. Where young workers are lawfully employed, the Company ensures they are protected from hazardous, dangerous, or exploitative working conditions. Such protections extend across all operations and are actively monitored through supplier engagement.

3.2 Forced Labor & Human Trafficking

The Company does not use, support, or tolerate forced labor or human trafficking in any form. Forced labor—including bonded labor, debt bondage, and human trafficking—violates fundamental human rights and dignity.

All forms of forced, bonded, or compulsory labor are prohibited and workers are not allowed to deposit money, documents, or personal belongings as a condition of employment. The Company ensures that workers have the right to leave employment freely and are not subject to threats, coercion, or deception.

3.3 Freedom of Association & Collective Bargaining

Workers throughout the Company's operations possess the fundamental right to form and join trade unions of their choice, to engage in collective bargaining, and to exercise freedom of association without fear of retaliation or discrimination.

Interference with or discrimination against workers exercising these rights is strictly prohibited. The Company recognizes that freedom of association and collective bargaining serve as essential mechanisms through which workers can advocate for fair treatment, safe working conditions, and equitable compensation. Rather than viewing worker representation as adversarial, the Company engages constructively with unions and worker representatives to address concerns and foster collaborative relationships.

Access to information regarding worker rights is ensured across all operations. Through transparent communication and regular dialogue with worker representatives, the Company demonstrates its commitment to respecting its workforce.

3.4 Fair Wages & Working Hours

The Company ensures that all workers receive fair compensation for their work. Wages meet or exceed legal minimum wage requirements.

Working hours comply with legal limits, overtime is voluntary, compensated at premium rates, and limited to exceptional circumstances. Wages are paid regularly, on time, and in full, with clear documentation of compensation components.

3.5 Health, Safety & Dignity at Work

Safe and healthy working conditions form a cornerstone of the Company's commitment to its workforce. Prevention of accidents, occupational diseases, and work-related injuries is achieved through a comprehensive approach: provision of appropriate personal protective equipment, regular health and safety training, and robust incident reporting and investigation procedures. These practices are detailed within the **Group ESG Policy**, implemented consistently across all operations, and regularly reviewed to reflect evolving best practices.

Worker well-being extends beyond physical safety: psychological health is likewise recognized as integral to human dignity and respect in the workplace. The Company ensures that all workers are protected from harassment, abuse, and degrading treatment. A zero-tolerance policy governs any form of violence, intimidation, or disrespectful conduct, with clear consequences for violations and support mechanisms for affected workers.

3.6 Supply Chain Management

The Company requires all suppliers, contractors, and business partners to comply with the principles set out in this Policy. Moreover, the Group implements a Code of Ethics and a Supplier Code of Conduct based on the United Nations Guiding Principles on Business and Human Rights, establishing expectations for supplier conduct across human rights, labor practices, and responsible business conduct. Suppliers are subject to assessments prior to engagement and ongoing monitoring to ensure alignment with these commitments.

4 DIVERSITY, EQUITY & INCLUSION STRATEGY

4.1 Non-Discrimination

Discrimination in recruitment, compensation, promotion, training, or termination based on gender, gender identity, sexual orientation, race, ethnicity, national origin, age, religion, disability, health status, marital or family status, or political affiliation is prohibited.

Discrimination undermines workplace culture, restricts talent development, and violates human rights principles. Merit, capability, and potential form the sole basis for employment decisions. The Company systematically identifies and eliminates discriminatory practices and unconscious biases in recruitment, evaluations, and compensation. Where violations occur, swift corrective action is taken.

4.2 Gender Equality & Pay Equity

The Company is committed to achieving and maintaining gender equality throughout the organization. Equal compensation for equal work is a fundamental principle; recruitment, promotion, and professional development opportunities are provided equitably to all employees regardless of gender. The organization recognizes the importance of work-life balance and accordingly provides comprehensive parental leave provisions. Sexual harassment and gender-based violence are not tolerated; the Company maintains clear reporting mechanisms and provides appropriate support to affected employees.

4.3 Diversity in Recruitment & Advancement

The Company actively promotes diversity through recruitment from diverse talent pools and the implementation of inclusive recruitment practices designed to remove barriers to employment for underrepresented groups. Diverse teams bring distinct perspectives, experiences, and ideas that enhance innovation, decision-making, and overall business performance. Promotion and advancement decisions are grounded in merit and capability, with equal opportunity afforded to all employees. The Company provides equitable access to development and advancement opportunities while systematically identifying and addressing systemic barriers that may limit opportunities for underrepresented groups, thereby actively supporting the development of diverse talent pipelines throughout the organization.

4.4 Disability Inclusion

The Company is committed to recruiting and retaining employees with disabilities and to creating an accessible and inclusive workplace. The aim is to create an inclusive workplace culture where employees with disabilities feel valued and supported, preventing discrimination and harassment based on disability and recognizing that employees with disabilities bring valuable skills, perspectives, and experiences to the organization.

5 DATA PRIVACY & PERSONAL INFORMATION PROTECTION

5.1 Privacy commitment

The Company respects the privacy and personal data of all employees, workers, candidates, and stakeholders. All personal information is collected, processed, and stored in compliance with applicable data protection laws, including the General Data Protection Regulation (GDPR) and equivalent legislation in all jurisdictions where the Company operates. Personal data is processed only for legitimate business purposes, with appropriate safeguards to prevent unauthorized access, misuse, or disclosure. Employees and workers have the right to access, correct, and request deletion of their personal data in accordance with applicable law.

The Company maintains transparent privacy notices that clearly explain how personal data is collected and used. Particular attention is given to protecting the personal data of individuals who report concerns through grievance and whistleblowing channels. Confidentiality and anonymity protections ensure that personal information of complainants is safeguarded throughout the investigation process.

6 GRIEVANCE MECHANISMS & WHISTLEBLOWING

6.1 Grievance Channels

The Company provides multiple channels through which employees and workers can report concerns, violations, or grievances. These channels include email options and a secure online whistleblowing platform with anonymous reporting capability. All channels are easily accessible, encouraging workers to use them and ensures no risk of retaliation.

The **Company's Whistleblowing Policy**, sets out the procedure for submitting reports, how they are managed, and how confidentiality and non-retaliation are guaranteed.

6.2 Investigation & Remediation

The Company investigates all grievances promptly and confidentially, protecting the identity of the complainant throughout the process. Investigations are conducted fairly and objectively, with involvement of appropriate personnel. Remediation is provided for substantiated violations, which may include corrective action, compensation, or other appropriate remedies.

All investigations are documented, and findings are communicated to relevant management. The Company tracks grievance statistics and resolution times and uses this information to identify systemic issues and drive continuous improvement.

6.3 Retaliation Protection

The Company strictly prohibits retaliation against any person who reports a concern or violation, participates in an investigation, refuses to participate in illegal or unethical conduct, or seeks to enforce this Policy.

The Company communicates this protection clearly to all employees and ensures that managers understand their responsibility to prevent and address retaliation.

7 DOCUMENT INFORMATION AND APPROVAL

Revision date	09/09/2026

This Policy is approved by the CEO of Industrie Celtex S.p.A. and is effective as of Q2 2026.



Andrea Bernacchi
President & CEO