



# GLOBAL HUMAN RIGHTS POLICY

CHIESI GROUP

*This is us*



# HUMAN RIGHTS POLICY

## 1 / AIM

Chiesi Group is committed to conducting its business ethically, with fairness, integrity, honesty and transparency and in compliance with the sustainability principles, which are a fundamental part of its values.

In order to fully integrate such principles into its business, Chiesi has achieved the B-Corp certification, has adopted the legal form of Benefit Corporation (where allowed by Applicable Laws), has defined the company Values and Behaviors, as guiding principles, and has implemented a set of policies and procedures aimed at fulfilling said principles (in particular, Chiesi Code of Conduct, Code of Interdependence<sup>1</sup> and Global D&I Policy).

Within this framework, Chiesi wants to officially declare its commitment to respecting standards aimed at protecting the fundamental and internationally recognized human rights<sup>2</sup> (hereinafter “**Human Rights**”) within its own business, operations and supply chain.

Chiesi declares to take a zero-tolerance approach against any kind of discrimination, violence and, in general, any action against Human Rights. In this regard, the purpose of this Policy is to provide Chiesi People with a set of principles to deal with Human Rights.

## 2 / SCOPE

This Policy applies to all Chiesi People across the whole Group.

## 3 / DEFINITIONS

“Affiliates” or “Chiesi Affiliates” mean any Affiliate of Chiesi Group.

“Chiesi” or “Chiesi Group” mean Chiesi Farmaceutici S.p.A. and relevant Affiliates.

“Chiesi People” means any legal representative, director, manager or employee of Chiesi.

“Policy” means this Human Rights Policy as approved by the Group CEO (Chief Executive Officer) and Group CHRO (Chief Human Resources Officer).

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<sup>1</sup> The Code of Interdependence is Chiesi’s code of conduct for suppliers and all strategic partners: a set of common values through

which Chiesi aims to collaborate only with companies and partners that share its commitment to sustainability. Human rights are a significant area covered by Chiesi's Code of Interdependence. The evaluation of all of our suppliers includes a key element of respecting human rights, which is considered a crucial precondition for their selection.

<sup>2</sup> International human rights are the ones recognized, at minimum, within the Universal Declaration of Human Rights (adopted by the United Nations General Assembly - in 1948), the International Covenant on Economic Social and Culture Rights and the International Covenant on Civil and Political Rights (jointly known as the "International Bill of Rights") and the ILO's (International Labour Organization) Declaration on the Fundamental Principles and Rights at Work.

## 4 / RESPONSIBILITIES

All addressees of this Policy are responsible for compliance with it. Chiesi's responsibility to respect human rights means that we:

- Provide a basis for embedding the responsibility to respect human rights **through all the departments**.
- Empower all the Affiliates to identify policy gaps and initiate a process that **alerts the company to new areas of human rights risk**.
- Enhance trust with stakeholders, understanding and addressing their concerns.
- Foster the development of **in-house learning activity to build awareness and knowledge** among all Chiesi People and support all business partners to increase this knowledge and awareness.

## 5 / CONTENT

### 5.1 / Commitments

Chiesi is committed to identifying, preventing and mitigating Human Rights risks across its own processes, operations and supply chain. Whenever adverse Human Rights impacts are identified, Chiesi is committed to providing for, or supporting, legitimate processes to enable the remedy of any adverse Human Rights impacts that Chiesi may have caused, contributed to cause or been linked with. Chiesi is committed to implementing the UN Guiding Principles on Business and Human Rights throughout our business and to respecting Human Rights in its conduct, in particular as follows:

- **Prohibition of child labour** – Chiesi must not use child labour in any form. We must act in full compliance with any applicable laws and regulations concerning prohibition of child labour and protection of young people at work. We must verify the age of our employees on a regular basis and, in such respect, we must check – based on the requirements and limits set forth by applicable data protection laws and regulations – officially recognized identity documentation, for example IDs, birth certificates, or passports, in order to verify the age of all our employees. We will not assign overtime nor any night shift to young workers (i.e. workers who are under the age of 18 but above the country's legal age for employment or the age established for completing compulsory education). For more details refer to *ILO Convention n. 138 and The United Nations Convention on the Rights of Child*.
- **Prohibition of forced/compulsory labour** – Chiesi condemns any use of forced or compulsory labour, whether in the form of prison labour, indentured labour, bonded labour or otherwise, as well as any form of "worst form of child labour", as defined (respectively) by ILO Convention No.29 and ILO Convention No.182 as well as human trafficking and any form of modern slavery. We must guarantee, through the application of the right policies and implementation mechanisms, that the rights and dignity of each individual person are preserved and respected at all times.
- **Prohibition of harassment and abuse** – Chiesi does not tolerate and condemns any form of corporal and verbal punishment, threats of physical and verbal violence or other forms of mental or physical coercion or harassment, inhuman and degrading treatment, or any other kind of abuse. For more details refer to *the Manifesto against Hostile Behaviors and Harassment at Work*.
- **Prohibition of discrimination** – Chiesi rejects any form of discrimination and is committed to promoting equal and fair opportunities, both upon establishment of the employment relationship and at each stage of its career. Every individual must be treated with respect and dignity. Chiesi does not engage in and tolerate any kind of discrimination – in particular with regards to wages, hiring, access to training, promotion, maternity and paternity, protection and dismissal - based



on gender, race or ethnic origin, religion, age, physical and mental disability, gender identity and sexual orientation, political affiliation, union membership, nationality, migrant status or social background and any other dimension that may harm integrity and respect for the people. *For more details refer to the Global D&I Policy.*

- **Freedom of association** – Chiesi acknowledges the right of its employees to form or take part in organizations aimed at defending and promoting their interests and does not interfere with their choices. It also recognizes their right to be represented, within the various work units, by unions or other forms of representation elected in accordance with the legislations and practices in force in the different countries of employment.
- **Health and safety** – Chiesi is committed to ensuring the highest health and safety standards of working conditions for employees and partners, promoting healthy behaviors, making all employees aware of the health, safety, environmental and energy impact of their work, fostering continuous improvement in this area, and assuring suitable information and training, with the involvement of all employees and employee representatives. *For more details refer to HSE&E Global Policy.*
- **Psychological safety and life harmony** – Chiesi is committed to create a positive and healthy environment where people can aim at harmony in their life, respecting employees' personal life-styles, looking at improving the quality of human life, creating programs for a workplace and way of working based on respect, trust, psychological safety where all employees feel comfortable to express themselves, their talents and give their best. *For more details refer to Global Wellbeing Guidelines.*
- **Working hours and fair remuneration** – Chiesi is committed to observe compliance with international standards and all applicable laws related to fair wages, remuneration, working hours and rest periods. *For more details refer to The United Nations Equal Remuneration Convention.*

## 5.2 / Action across the Group

Chiesi's responsibility to respect human rights means that we have to implement the following actions as a minimum:



**Policy Application:** All Chiesi Affiliates are responsible for knowing and applying the Policy, set up appropriate controls upon their own processes and operations, involving the relevant local functions to the extent of their respective areas of responsibility. Chiesi wants them to feel accountable for implementing processes accordingly with this policy, monitoring them and implementing possible improvement plans. Monitoring activities with respect to the local implementation plans deployment will be performed at Corporate Level in the period following the Policy release.



**Training:** we must foster the development of in-house learning activity to build awareness and knowledge among all Chiesi People. All Chiesi People must be duly trained on this Policy and we need to certify that they have attended the programmed courses.



**Policy Review:** the policy is considered valid for the whole Chiesi Group and will be reviewed if necessary following possible normative changes and/or on the basis of reports received after its application by all those who are called upon to apply it.

## 5.3 / Grievance mechanism

Any infringement of this Policy will not be tolerated by Chiesi, who will also take any appropriate disciplinary and/or business actions.

In this respect, any actual, believed or suspected conduct/event which may entail a violation of this Policy shall be communicated by Chiesi People:

- if feasible and appropriate due to the specific situation, by activating internal communication flows: HR and/or Compliance or informing relevant line manager or reference people for D&I, depending on how the person feels more comfortable. Once a report has been received, they will assure confidentiality, assess next steps aimed at assuring protection, respect, safeguard and addressing the most appropriate intervention and reporting way; or
- through [Chiesi Whistleblowing](#) channel: [SpeakUp&BeHeard](#).

SpeakUp&BeHeard reporting system:

- allows anyone (both employees and non-employees) to raise any conduct reasonably believed to be unfair (or even illicit) that could potentially damage Chiesi business and/or reputation or that of third parties;
- is structured to ensure the highest level of protection and confidentiality towards the whistleblower and any information communicated via the system, in compliance with applicable data protection laws.

Any retaliatory action against the whistleblower is strictly prohibited: Chiesi is committed to protect all whistleblowers against any form of discrimination and/or retaliation, in connection with any report made in good faith.

Reports communicated via SpeakUp&BeHeard will be managed according to the instructions available within Chiesi intranet and/or website area dedicated to SpeakUp&BeHeard.

## 6 / APPLICABILITY & COMMUNICATION

When national legislation or other applicable regulations address the same issue as this Policy, the highest standards or most restrictive principles shall apply. When this Policy is in contradiction with applicable laws, the applicable law shall apply.

This Policy is communicated to all Chiesi People and it is publicly available to share our values and commitments with external stakeholders.

## 7 / CONCLUSIONS

This Policy is part of the policy framework that the Group has decided to formalize to protect all aspects of respect for Human Rights as part of a path of continuous cultural evolution. We constantly aim to keep all the tools of protection up to date, on the basis of Chiesi's commitment to promote, apply and practice the company values and behaviors (This is Us) in all business activities.

*This is us*

## Reference Documentation

### INTERNAL

Code of Conduct  
Code of Interdependence  
Global D&I Policy  
Manifesto against Hostile Behaviors and Harassment at Work  
Global Wellbeing Guidelines  
HSE & E Global Policy  
This is Us (Group Values & Behaviors Chart)  
We Act Sustainability Manifesto

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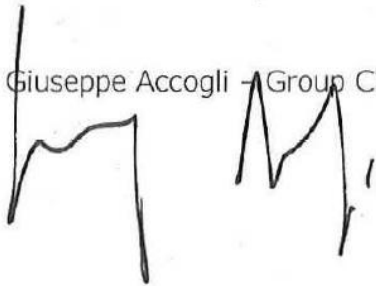
### EXTERNAL

United Nations Human Rights Council - Guiding principles on Business and Human Rights  
International Bill of Rights  
Principles of ILO (International Labour Organization)  
United Nations Sustainable Development Goals  
International Labour Organisation's Declaration on Fundamental Principles and Rights at Work  
United Nations Convention on Rights of the Child  
United Nations Equal Remuneration Convention

### SIGNATURE

Parma, 17/07/2023

Giuseppe Accogli - Group CEO



Giacomo Mazzariello - Group CHRO

