



**BOLTON**  
GROUP

**HUMAN RIGHTS POLICY**





**“All human beings are born free and equal in dignity and rights.  
They are endowed with reason and conscience  
and should act towards one another in a spirit of brotherhood.”**

*Art. 1 of the Universal declaration of Human Rights*

## BOLTON GROUP'S POLICY ON HUMAN RIGHTS

### Our principles

Respect for fundamental human rights is an essential element of the Sustainability of the Bolton Group. Dignity and respect for the individual are at the heart of our corporate culture.

Bolton Group is committed to promoting the respect of Human Rights and eliminating their violation, both within the Company as well as among its suppliers.

The Bolton Group's Human Rights Policy is grounded in the Group's core values and Code of Ethics.

Respect for the principles expressed in the Human Rights Policy is to be considered as an integral part of the duties of all our employees and suppliers.

Bolton Group's relationships with its stakeholders are based on transparency and mutual trust. For this reason the Company implements and supports the internationally recognized Human Rights laid down in the *Universal Declaration of Human Rights* and the conventions which it inspired, such as the *ILO Declaration on Fundamental Principles and Rights at Work*, the *United Nations Conventions on the Rights of the Child*, the *Children's Rights and Business Principles* promoted by UNICEF, Global Compact and Save the Children.

### Concrete evidence of our commitments

Bolton Group monitors the implementation of its Human Rights Policy and Code of Ethics within the Group's activities, and it promotes these principles among its commercial partners and suppliers.

In order to perform these evaluations and analyses, the Bolton Group avails itself of universally shared methodologies, such as the OECD Guidelines for Multinational Enterprises, the ISO 26000 Guidelines and other documents related to them.

All the evidence gathered during the evaluation phase represents an incentive for the Group and its commercial partners to redefine policies, actions and behaviours which allow the full respect of Human Rights in the contexts where they work.

If non-compliance with the policy is found in the Group or among its suppliers, its causes will be analysed and a plan will be defined in order to promote compliance.

## HUMAN RIGHTS

### *Free Association and Collective Bargaining*

We respect the right of our employees to be appropriately represented and to freely form and/or join workers' organizations or Trade Unions without retaliation, intimidation or harassment. We are committed to establishing a constructive dialogue with the workers' freely chosen representatives, basing all negotiations on mutual respect and good faith.

### *Working and Pay Conditions*

We offer remuneration aligned with the local law and sector standards; we work in full compliance with the existing law on wages and salaries, benefits, working hours and overtime.

The ways in which we define remuneration are based on objective criteria.

We are committed to respecting weekly working hours provided for by the local legislation and to not exceeding what is established by the ILO Conventions on this matter. We make sure that overtime is adequately paid.

We are committed to giving adequate rest periods to our employees, granting them the right to at least one day off a week.

### *Child Labour and Forced Labour*

We do not rely on child labour as it is defined by the reference ILO Conventions. The Group does not employ children under the age of 15 and will not hire children under the local age for employment. Furthermore, we are committed to guaranteeing a suitable position for employees under the age of 18 as specified in the relevant ILO Conventions. We reject any kind of forced labour as defined by the reference ILO Conventions and Recommendations.

### ***Health and Safety Protection***

We provide a healthy and safe working place for all our staff in compliance with the health and safety laws in force. We are committed to keeping the working places productive and safe, minimizing the risk of accident or injury. We are also committed to involving our staff in the constant improvement of the health and safety conditions of our workplaces in line with the local laws.

We guarantee our employees the right of access to preventive health care and to benefit from medical treatment under the conditions established by local laws and practices.

### ***Respect for Individuals and Diversity***

We respect diversity and the right to equal opportunities. We do not tolerate any form of discrimination of race, colour, gender, language, religion, nationality, political opinion, sexual orientation or social status and we encourage the promotion of an ethical conduct within the workplace.

In the same way, we are committed to preventing any form of physical, verbal, sexual or psychological harassment or abuse, as well as threats and intimidation at work.

### ***Rights of Local Populations***

We conduct our activities while respecting the rights of the local communities inhabiting the areas where the Group operates with its plants and we pay attention to the most vulnerable local communities.

### ***How to report breaches***

With relation to the Human Rights Policy, appropriate reporting tools have been implemented and made known to all employees and commercial partners.



*We Care Where You Care*



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