

HUMAN RIGHTS POLICY

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ABSTRACT

Human rights protection is one of main principles of the CRIF Code of Conduct, in line with its corporate values.

CRIF promotes the protection of Human Rights in all the countries it operates in. The Company is committed to safeguarding the dignity of all human beings and to protecting health & safety and privacy rights, condemning all forms of discrimination, violence and corruption, both inside and outside the workplace.

This Policy is also inspired by the United Nations Agenda 2030 Sustainable Development Goals (SDGs) aimed at fighting inequality and building a society that respects human rights.

PURPOSE

The Policy is aimed at defining the guiding principles, responsibilities and actions to support and promote Human Rights protection, in line with the international reference framework defined by the United Nations Universal Declaration of Human Rights, the Fundamental Conventions of the International Labor Organization (ILO) and the principles of the United Nations Global Compact.

SCOPE

This Policy applies to all CRIF Group companies.

USERS

These principles and provisions are applicable to CRIF Group, defined as CRIF S.p.A. and other Italian and foreign companies controlled by it and related to it (herein also referred to as **CRIF** or **Company**), and shall be binding for CRIF directors, for all CRIF employees and those who work for CRIF, whatever the employment relationship, including temporary employees, contractors, suppliers and interns/trainees (herein also referred to as **Recipients**).

SUPPORT OF INTERNATIONAL HUMAN RIGHTS

As a signatory of the United Nations Global Compact (UNGC), CRIF supports the Compact's Ten Principles, which are based on the Universal Declaration of Human Rights.

The Ten Principles of the UNGC are:

Human Rights

1. Businesses should support and respect the protection of internationally proclaimed human rights; and
2. make sure that they are not complicit in human rights abuses;

Labor Standards

3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
4. the elimination of all forms of forced and compulsory labor;
5. the effective abolition of child labor; and
6. the elimination of discrimination in employment and occupation;

Environment

7. Businesses should support a precautionary approach to environmental challenges;
8. undertake initiatives to promote greater environmental responsibility; and
9. encourage the development and diffusion of environmentally friendly technologies;

Anti-Corruption

10. Businesses should work against corruption in all its forms, including extortion and bribery.

Under the UNGC, human rights are the same as labor rights.

Furthermore, this Policy must be read together with the CRIF Group *Code of Conduct*, the CRIF Group *Diversity & Inclusion Policy* and the CRIF Group *Modern Slavery Policy*, whose provisions on the Company's grievance procedure, support for diversity and the rejection of any form of discrimination, abuse and corruption are fully incorporated by reference in this Policy.

PREVENTION OF LABOR ABUSES

CRIF prohibits any form of forced or compulsory labor, and condemns any form of human trafficking and slavery. For the Company's provisions on Modern Slavery, please refer to the corporate "*Modern Slavery Policy*".

CRIF Group companies worldwide comply with applicable laws relating to working hours, wages, overtime and benefits.

The Company adopts a zero-tolerance policy against child labor, in compliance with Human Rights International Standards and the CRIF Code of Conduct. CRIF is committed to preventing any form of child labor and prohibits employment under the age of 16 in all CRIF companies.

PROHIBITION OF ANY FORM OF HARASSMENT AND DISCRIMINATION

CRIF respects the dignity, privacy and personal rights of all employees and is committed to avoiding any cases of discrimination and harassment in the workplace.

No form of harassment and discrimination on the basis of origin, nationality, religion, race, gender or sexual orientation, or engagement in any kind of verbal or physical harassment based on any of the factors mentioned above, or on other grounds, is tolerated by CRIF.

CRIF adopts a Diversity & Inclusion Policy aimed at promoting equal opportunities throughout the whole employee life cycle and guaranteeing an inclusive workplace where every employee feels free to express their potential.

All forms of physical, psychological or verbal violence, including bullying and harassment, are strictly forbidden and employees who believe that the above principles are not being respected in their workplace are encouraged to report the matter to their Line Manager and/or Human Resources, according to the procedure outlined in the Company Code of Conduct.

PROVISION OF A SAFE AND SECURE WORKPLACE

The Company considers the health and safety of its employees to be a priority. CRIF provides employees with a healthy and protected work environment and adequate training to carry out work activities safely, minimizing the risk of accidents and injury and reducing exposure to health, safety and security risks.

CRIF ensures the implementation of a set of policies and procedures aimed at occupational health and safety. In addition, the Company organizes periodic training and awareness sessions on workplace hazards, provided for employees, contractors and suppliers.

Moreover, CRIF is committed to protecting both physical and psychological safety to ensure workplace wellbeing beyond what is required by the legislation.

RESPECTING THE RIGHTS OF LOCAL COMMUNITIES

CRIF operates at a Global level, embracing worldwide differences, which is also one of the CRIF Principles and Values declared in the Company Code of Conduct. CRIF respects the local culture in every country it operates in.

DATA PROTECTION AND PRIVACY

CRIF is a company specializing in credit information and business information systems, in which the processes of data collection, analysis and processing constitute the core activities of the products and services offered by the Group. For this reason, CRIF is acutely aware of the right to privacy and takes all reasonable measures to protect employees against unauthorized access to, or use, destruction, modification or disclosure of their personal information and data.

Information protection and the maintenance of adequate levels of service continuity are essential components in the management of business activities. CRIF Group companies have always paid significant attention to information security issues (data and cybersecurity) by making it one of the underlying elements of the Company's culture, and by adopting innovative criteria for the management of organizational, process-related and technological activities. For CRIF, guaranteeing Security Governance means first of all making information security a central theme in the management of the business, guaranteeing its coordination within the management structure, defining specific objectives, and checking their progress through continual monitoring.

CRIF has defined a documented Security Governance Framework, which includes a Personal Data Protection System, in order to ensure the implementation of regulatory Data Protection requirements.

Data security and cybersecurity are documented in the Corporate Information Security Policy and Privacy Policies.

REPORTING & IMPLEMENTATION

CRIF is committed to the implementation of this Policy and to ensuring that the Company complies with all applicable laws, and follows the Principles and Values declared in the Code of Conduct and this Policy.

CRIF commits to assessing its suppliers and subcontractors to ensure compliance with the Principles and Values declared in the Code of Conduct and in this Policy.

All Recipients are required to avoid any activities that might lead to a breach of this Policy and must notify their HR Business Partner, their manager or the relevant contact person within CRIF Group as soon as possible if they believe or suspect that a breach of this Policy has occurred or may occur in the future. CRIF undertakes to ensure that the reporting employee does not face any form of retaliation or any detrimental treatment (including dismissal, disciplinary action, threats or other unfavorable treatment).

INFORMATION AND COMMUNICATION

In order to ensure the correct understanding of this Policy, CRIF is committed to bringing the Human Rights Policy to the attention of internal and external Recipients through communication activities (e.g., posting on the Company notice board, sending to all employees, posting on the intranet and/or the Company website, sending to contractors, etc.).

REFERENCES

Agenda 2030 for Sustainable Development Goals (SDGs)

EU Regulation No. 679/2016 (GDPR)

REVISION HISTORY

Version	Revision Date	Description	Approver Name
1.0	27/04/2023	First release	