

## POLICY FOR THE PROTECTION OF HUMAN RIGHTS

Approved by the Board of Directors on July 15<sup>th</sup>, 2026

**Pharmanutra S.p.A.**

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C.F. / P.Iva / Reg. Impr. 01679440501 - Codice SDI SUBM70N | Cap.Soc. € 1.123.097,70 I.V. | REA 146259



## 1. GUIDING PRINCIPLES

This Policy is inspired by the principles set out in the Group Code of Ethics and in the Organizational, Management and Control Model pursuant to Italian Legislative Decree No. 231/2001.

It is also inspired by:

The Constitution of the Italian Republic;

The Universal Declaration of Human Rights;

The Fundamental Conventions of the International Labour Organization (ILO);

The ILO Declaration on Fundamental Principles and Rights at Work;

The United Nations Conventions on the Rights of Women, the Elimination of All Forms of Racial Discrimination, the Rights of the Child, and the Rights of Persons with Disabilities;

The United Nations 2030 Agenda for Sustainable Development;

The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

## 2. SCOPE OF APPLICATION

This Policy – approved by the Board of Directors of Pharmanutra S.p.A. (the “Company”) – applies to the members of the corporate governance and supervisory bodies, executives, employees and collaborators of the Company, as well as to all Group companies in Italy and abroad.

Pharmanutra also promotes awareness among and encourages all its suppliers, business partners and stakeholders in general to adopt the procedures necessary to protect and uphold human rights.

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### 3. HUMAN RIGHTS PROTECTION

Pharmanutra recognizes respect for human rights as a fundamental, indispensable principle and an integral part of its ethical values and sustainable development strategy.

The Company also recognizes the benefits arising from an international and social order in which rights and freedoms are fully realized and is committed to:

- contribute to the promotion and protection of full respect for human rights;
- promote the dignity, health, freedom and equality of workers;
- eliminate all forms of discrimination, corruption and exploitation;
- exercise due diligence in identifying circumstances in which the risk of human rights violations may be heightened or exacerbated.

The Group refrains from entering into or maintaining relationships of any kind with individuals or legal entities that operate in violation of laws and regulations concerning the protection of human rights and workers' rights.

#### 3.1 Discrimination and vulnerable groups

Pharmanutra is opposed to all forms of discrimination, whether direct or indirect, against any of its stakeholders.

The Group does not tolerate discrimination of any kind, based on gender, ethnicity, religion, political beliefs, social background, or any other characteristic. It is also committed to fostering a healthy work environment that promotes the physical and psychological well-being, personal development and growth of individuals, based on equal opportunities and mutual respect.

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In particular, Pharmanutra supports gender equality and bases the management of its human resources on the principles of fairness, integrity and meritocracy.

### 3.2 Civil and political rights

Pharmanutra safeguards the moral integrity of all its employees and collaborators and guarantees their right to working conditions that respect human dignity, as well as the full exercise of their civil, trade union and political rights.

Respect for workers' dignity must also be ensured through the protection of their privacy. To this end, Pharmanutra, in full compliance with personal data protection regulations and the laws safeguarding the privacy of all Employees and, more generally, of anyone who interacts with the Group in any capacity, adopts specific rules aimed, in particular, at preventing the improper disclosure and/or dissemination of personal data without the prior consent of the data subject.

### 3.3 Economic, social and cultural rights

The Group is committed to rejecting any activities that violate, hinder or interfere with the enjoyment of economic, social and cultural rights by employees, business partners, customers and other stakeholders over whom it may have influence.

To this end, it gives due consideration to the potential impacts of its decisions, activities, products and services.

### 3.4 Fundamental Principles and Rights at Work

Pharmanutra recognizes the right to work as a fundamental human right and is committed to ensuring fair, safe and dignified working conditions, in full compliance with the fundamental principles and rights at work established by the International Labour Organization (ILO).

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In particular, Pharmanutra is committed to ensuring:

- freedom of association and the recognition of employees' right to collective bargaining;
- appropriate means enabling workers' representatives to carry out their duties effectively and perform their role without interference;
- the elimination and prevention of all forms of forced labour and child labour exploitation.

The Group does not tolerate the establishment of employment relationships in breach of applicable laws and regulations, whether by suppliers, business partners or customers.

The Group is also committed to undertaking initiatives aimed at supporting its people in achieving a healthy work-life balance.

Pharmanutra is committed to ensuring the following conditions:

### 3.4.1 Free and Non-Discriminatory Access to Employment

- ensuring equal opportunities for access to employment, without discrimination based on gender, age, nationality, ethnic origin, sexual orientation, gender identity, religion, political opinions, disability, or any other personal characteristic;
- adopting recruitment, hiring and personnel management processes based exclusively on criteria of competence, merit and professionalism.

### 3.4.2 Decent and Safe Working Conditions

- ensuring a healthy, safe and respectful working environment that safeguards the dignity of every individual;

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- preventing any form of abuse, harassment, violence or conduct that may undermine individual dignity;
- ensuring compliance with all applicable occupational health and safety laws and regulations.

### 3.4.3 Prevention of Forced Labour and Child Labour

- prohibiting all forms of forced, compulsory or coercive labour;
- rejecting and combating child labour, in compliance with applicable laws and ILO Conventions;
- monitoring compliance with these principles throughout the supply chain to ensure that they are upheld by suppliers and business partners as well.

### 3.4.4 Fair Remuneration and Transparent Employment Conditions

- ensuring fair remuneration in compliance with applicable laws and the minimum standards established by collective bargaining agreements;
- ensuring that working hours, rest periods and leave entitlements are in line with applicable legislation;
- promoting regular employment relationships based on clear and understandable contractual terms.

### 3.4.5 Freedom of Association and Social Dialogue

- respecting workers' rights to freedom of association, trade union representation and collective bargaining;
- fostering an environment of open dialogue, participation and constructive engagement between the Organization and its workforce.

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#### 4. REPORTING OF VIOLATIONS

Anyone who believes that violations of this Policy have occurred may report the matter, including anonymously, through the whistleblowing channel established by the Company and available on its website at the following link:

<https://pharmanutragroup.com/governance/segnalazioni-whistleblowing/>

#### 5. COMMUNICATION AND UPDATING OF THIS POLICY

This Policy is available on the Company's website at *www.pharmanutragroup.com*. The Group is committed to monitoring and, where necessary, updating the systems and measures aimed at ensuring respect for Human Rights, in line with developments in applicable legislation and internationally recognized principles and standards.

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