

AMPLIFON'S HUMAN RIGHTS POLICY

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Contents

1. SCOPE OF APPLICATION	2
2. PURPOSE OF THE POLICY	2
3. AMPLIFON'S VALUES.....	2
4. AMPLIFON'S HUMAN RIGHTS COMMITMENT AND PRIORITY AREAS	3
• Repudiation of forced, compulsory and child labour.....	4
• Promotion of gender equality, diversity, inclusion and belonging.....	4
• Protection of the health, safety and welfare of workers	4
• Freedom of association and collective bargaining	4
• Respect for personal dignity and prevention of harassment and abuse ...	4
• Privacy and data protection	5
• Fair remuneration fair and decent working conditions	5
5. COMMITMENT IN THE VALUE CHAIN	5
6. SHARING AND AWARENESS	5
7. REMEDIATION MECHANISMS.....	6
8. MONITORING, UPDATE AND REVIEW.....	6
9. IMPLEMENTATION AND APPROVAL	7

1. SCOPE OF APPLICATION

The present Amplifon S.p.A. (hereinafter “**Amplifon**” or the “**Company**” and together with its subsidiaries the “**Group**” or “**Amplifon Group**”) Human Rights Policy (hereinafter also referred to as “**Policy**”) applies to all Group companies, in any country where the Amplifon Group operates and to every person in the Group, such as employees, collaborators, suppliers, business partners and third- party stakeholders, with whom the Group has professional relations.

It represents the Group’s commitment to respecting human rights within its workforce, as well as throughout the value chain.

This Policy is published on the website and any internal or external stakeholder may read it.

2. PURPOSE OF THE POLICY

The purpose of this Policy is to formalise the Group's commitment to the promotion and protection of fundamental human rights, in line with the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights (hereinafter also referred to as “**UNGPs**”), the Fundamental Conventions of the International Labour Organisation (hereinafter also referred to as “**ILO**”) and the IO principles of the United Nations Global Compact (hereinafter also referred to as “**UNGC**”), which the Group is committed to comply with. It complements the Code of Ethics, the DEIB Policy, the Sustainability Policy, the Supplier Code of Conduct and the Anti-Corruption Policy.

3. AMPLIFON’S VALUES

The Group's commitments to human rights are based on the corporate values listed below, the cornerstones of its ethics and culture. These values guide the actions and behaviour of Amplifon Group people all over the world, defining an inclusive and responsible model of leadership, oriented towards the well-being of people and communities.

- **CUSTOMER DEVOTION:** the Group acts in the interests of the people who rely on its services and promotes the right to health, accessibility and quality of life, surpassing customers' expectations with care and attention;
- **PERSONAL IMPACT:** the Group promotes environments where everyone can express themselves freely and make a genuine contribution. Self-realisation, freedom of opinion and the valorisation of individual potential are an integral part of the Group's identity;
- **EVERYDAY EXCELLENCE:** the Group's daily commitment to excellence means ensuring decent, inclusive and safe working conditions and pursuing continuous improvement while respecting everyone's rights.
- **FORWARD THINKING:** innovation and active listening to the global context are levers to responsibly address emerging risks to human rights risks, anticipating them through sustainable and inclusive practices;
- **ACTING RESPONSIBLY:** every Group action is characterised by respect, fairness and transparency. The Group promotes legality, condemns all forms of abuse, discrimination and exploitation, and actively supports the culture of respect for human rights in all its forms.

In line with the above-mentioned values, the Group is committed to integrating the protection of human rights into its activities and relations with a proactive approach oriented towards continuous improvement. This includes actively engaging stakeholders, monitoring impact on human rights and defining effective corrective actions, in compliance with regulations and the highest international standards.

4. AMPLIFON'S HUMAN RIGHTS COMMITMENT AND PRIORITY AREAS

The Amplifon Group recognises its role in the respect, protection and promotion of human rights within its business. The Group is committed to preventing and mitigating any negative impact, taking effective corrective measures in the event of violations and promoting a culture of respect for human rights among all stakeholders.

The Group periodically analyses the current and potential risks and impact its activities may have on human rights, and defines strategies and measures to prevent and mitigate them. This approach reflects its ongoing commitment to improving the effectiveness of its protective actions and responsible management. The Group is committed, through its actions, to enhancing the effectiveness of risk prevention

measures and human rights training so as to avoid being directly associated with, contributing to or causing such impacts.

The basic human rights principles for the Amplifon Group include:

- **Repudiation of forced, compulsory and child labour.**

The Amplifon Group repudiates any form of forced, compulsory or child labour and adopts ILO definitions of minimum age for employment.

- **Promotion of gender equality, diversity, inclusion and belonging**

The Amplifon Group actively promotes gender equality, diversity and inclusion through concrete initiatives aimed at overcoming stereotypes and prejudices, guaranteeing every person in the Group equal access to opportunities, regardless of cultural background, gender, age or disability.. The Group considers individual differences to be a key resource for innovation and its own success.

- **Protection of the health, safety and welfare of workers**

Amplifon is committed to fostering a safe, inclusive and respectful work environment, where the physical and mental well-being of all individuals is actively safeguarded, by promoting preventive practices, ongoing training and compliance with health and safety regulations. The Group values well-being as a key element for motivation, productivity and inclusion, promoting collaboration between colleagues.

- **Freedom of association and collective bargaining**

The Amplifon Group protects the right of its employees to form or join associations and organisations representing their interests. The Group recognises and respects the right of workers to be represented, in accordance with laws and best practices, by trade union bodies or other forms of elected representation. In addition, it considers collective bargaining a fundamental tool for defining working conditions and regulating relations between company management and union representatives.

- **Respect for personal dignity and prevention of harassment and abuse**

The Amplifon Group is committed to ensuring a working environment based on respect for personal dignity, free from any form of harassment, abuse or intimidating behaviour, whether explicit or implicit. The Group promotes a culture of mutual respect and psychophysical integrity, prohibiting any conduct that could jeopardise individual well-being or create a hostile climate.

- **Privacy and data protection**

The Amplifon Group protects the privacy and personal data of all its stakeholders and is committed to treating the same responsibly, transparently and in full compliance with applicable laws. The Group guarantees the protection of information by means of appropriate technical and organisational measures, and promotes a culture of confidentiality and security, recognising such aspects as an integral part of the fundamental rights of the individual.

- **Remuneration fair and decent working conditions**

The Amplifon Group recognises the right of everyone to receive a fair and decent wage, considering it an essential condition for ensuring an adequate standard of living. The Group is committed to ensuring remuneration that complies with applicable regulations, legal minimums and wage standards in the countries where it operates, while ensuring safe working conditions and respect for human dignity.

5. COMMITMENT IN THE VALUE CHAIN

The Amplifon Group requires its suppliers and business partners to respect human rights, as set out in the Suppliers Code of Conduct. By adopting the latter, the Group's business partners undertake to conduct their business operations in a responsible manner, repudiating the exploitation of child and forced labour, requiring compliance with working conditions and health and safety, promoting non-discrimination and inclusion. To strengthen risk management along the value chain, the Group conducts supplier mapping to identify the risk related to ESG issues. This analysis takes into account variables such as sector, spending and geographical area. The Group may also carry out assessments of compliance with the values and requirements of the Suppliers Code of Conduct.

If the principles of the Suppliers Code of Conduct are not complied with, the Group may request the adoption of a corrective or improvement plan. In more serious cases, should it not be possible to resolve the problem or if the Supplier should fail to collaborate, termination of the contract may be considered.

6. SHARING AND AWARENESS

The Amplifon Group promotes human rights awareness through:

- Mandatory training programmes for employees such as those on the Code of Ethics, Diversity Equity Inclusion and Belonging and Whistleblowing Policy;

- On-boarding activities for newly hired personnel that include the principles of this Policy;
- Awareness-raising through corporate initiatives and internal campaigns;
- Specific training for suppliers;.
- Audits at suppliers that also cover Human Rights issues.

7. REMEDIATION MECHANISMS

The Group has implemented a whistleblowing system based on criteria of trust, impartiality and protection of whistleblowers, and of the persons named in the report, which allows for the reporting of conduct on which there is a reasonable and well-founded suspicion of violation of the Group's principles and standards, including the protection of human rights. All addressees of this Policy are required to promptly report any conduct that may involve a violation of the principles contained in this Policy. The Amplifon Group handles reports confidentially, to the fullest extent possible under applicable regulations, and is committed to protecting the identity of the whistleblower and the persons involved as well as the confidentiality of the information contained in the reports. For further details, please refer to the Group Whistleblowing Policy.

8. MONITORING, UPDATE AND REVIEW

In line with the United Nations Guiding Principles on Business and Human Rights (so-called "**Protect, Respect, Remedy**"), the Amplifon Group is committed to:

- Monitoring Human Rights Issues in ESG Risk Management Processes;.
- Monitoring the implementation of the Policy through actions, verifications and internal controls;
- Periodically reviewing the Policy to bring it into line with any significant regulatory or organisational changes or in the event of human rights violations;
- Involving internal and external stakeholders to improve the effectiveness and consistency of the Policy.

9. IMPLEMENTATION AND APPROVAL

Various departments of the Group are involved in the operational management of human rights issues, including, in particular:

- The **Investor Relations & Sustainability Department**, which provides guidelines for sustainable development that also include respect for human rights, both within the organisation and along the supply chain, in communities, in relations with customers and in general with all stakeholders with whom the Group has professional relations;
- The **Corporate Legal & Compliance Department**, which deals with the management and protection of legal aspects, the management of legal areas relating to contracts with suppliers and business partners, and also provides legal support to other departments on various issues, including human rights;
- The **Human Resources Department**, which ensures the proper management of people working in the name and/or on behalf of the Group, ensuring respect for human rights and workers' rights, as well as full compliance with the principles expressed in the Group's DEIB Policy;
- The **Procurement & Supply Chain ESG Department**, responsible for compliance with and implementation of the principles expressed in the Suppliers Code of Conduct, supply chain management and, therefore, relations with business partners and suppliers also with a view to protecting human rights; the department performs this role by conducting assessments and audits also related to human rights issues;
- The **Group Whistleblowing Committee**, handles reports of alleged irregularities in the company via the whistleblowing channel;

Additional control departments (e.g. Internal Audit) may periodically carry out verification activities on the scope of this Policy.

The Group CEO is responsible for approving, adopting and supervising the Group's compliance with this Policy.