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PO_R.2 Human Rights Policy

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OBJECTIVE AND SCOPE

Lavazza Group (or "Lavazza") recognizes the centrality of the person, the dignity of work and respect for human rights as fundamental principles for the sustainability of its activities and for the creation of value in the territories in which it operates.

Within the Group, we believe that the way we work is no less important than the results we achieve under no circumstances should the achievement of corporate objectives prevail over legal or ethical standards. We wish to emphasize this point again, as it has already been clearly stated in our Supplier Code of Conduct.

The Group is committed to promoting responsible business management at all levels of its production chain, respecting, and contributing to the protection of all the rights of the individual. This Human Rights Policy (hereinafter also the "Policy") defines the principles underlying this commitment to respect and promote fundamental human rights and to mitigate any negative impact of its activities, through an approach based on risk assessment criteria, inspired by the main national and international standards and best practices.

Luigi Lavazza S.p.A. has incorporated its Human Rights Policy into its overall business model and all its subsidiaries, describing in detail the principles that the Group undertakes to promote wherever it operates, directly or indirectly, in the performance of its business relationships.

This Human Rights Policy governs all the Group's activities, including production, distribution, and commercial activities, as well as relations with suppliers, business partners and the entire value chain, including employees, workers in the supply chains, local communities, and consumers.

The application of this Policy is ensured by the Company Departments and subsidiaries of the Group through the appropriate control tools, which vary based on their respective areas of responsibility.

This Policy is aligned with the Group's corporate values and Code of Ethics, and it is part of the Group's regulatory compliance process with respect to the European Union's Corporate Sustainability Reporting Directive (CSRD), which came into force on 5 January 2023, amending the Non-Financial Reporting Directive (NFRD) no. 2014/95/EU.

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OUR FUNDAMENTAL PRINCIPLES

The Human Rights Policy describes in detail: the fundamental principles that the Group respects, how it integrates them into its business activities and how each Group Company encourages its stakeholders to do the same.

- **Child labour and children's rights:**
  Lavazza considers children's rights as a non-negotiable principle. In every employment relationship established directly by the Group, Lavazza respects the human rights of children, such as the right to protection and education, and complies with the definitions provided by ILO Conventions in relation to the minimum age for employment and hazardous work. The Group also requires its business partners to align with this principle through its Supplier Code of Conduct and various multi-stakeholder initiatives.

- **Forced labor:**
  In its direct operations, the Group rejects all forms of forced labour, labour performed under the constraint of repayment of a debt, servitude and human trafficking, modern slavery, as well as all types of work under conditions of psychological and/or physical coercion. The Group also requires its business partners to align with this principle through its Supplier Code of Conduct and various multi-stakeholder initiatives.

- **Fair and dignified empowerment and adequate working conditions:**
  The Group promotes a working environment based on trust, dialogue and mutual respect and protects the well-being of its workers. The remuneration paid within the Group is fair and competitive and guarantees a decent standard of living.

- **Diversity, equity, inclusion, and non-discrimination:**
  The Group strongly believes in promoting equal opportunities and valuing diversity. It is committed to creating a workplace free from all barriers and discrimination, where every employee can express their true selves — a cornerstone value of the Group. (*Ref. to Group D&I Policy*).

- **Freedom of trade union association:**
  The Group recognizes the right of workers to freely join a trade union and to participate in trade union meetings without hindrance.

- **Health and safety at work:**
  the Group considers the health and safety of workers to be a fundamental value and takes a proactive role in maintaining a safe and healthy working environment, adopting high standards of prevention, assessment and management of related risks, involving employees, as well as promoting and constantly disseminating a corporate culture oriented towards health and safety at work (*Ref.to*

Corporate Health, Safety and Environment Policy, Occupational Health and Safety Management System ISO 45001);

- **Personal data protection and privacy:**
  The Group respects and protects the privacy and security of personal information in accordance with the laws and standards in force on the protection of personal data and has adopted a specific Policy on the subject (*Ref. to Group Privacy Policy*).

- **Respect and protection of the environment:**
  the Group believes that environmental protection is an integral part of the full enjoyment of human rights. The Group is therefore committed to reducing direct and indirect environmental impacts related to its products, processes, and services. Programs are in place to reduce greenhouse gas emissions, protect biodiversity, and responsibly manage water, energy, and waste resources, with a view to promoting a circular economy. (*Ref. to Corporate Health, Safety and Environment Policy and ISO 14001 Environmental Management System).*

- **Consumer health:**
  The Group ensures that its products meet high-quality standards. For this reason, it has adopted internal guidelines and specific policies that deal with the issue of product quality and safety (*Ref. to* Food Quality and Safety Policy - *PO_P.2. Quality & Food Safety*). Consumer health is a priority, so transparent and accessible communication channels are set up, available to all consumers.

- **Responsible marketing:**
  The Group uses methods and forms of communication suitable for making the message authentic, clear, transparent, and exhaustive, guiding consumer choices without manipulative or deceptive intent.

- **Fight against corruption:**
  Lavazza Group rejects and combats all forms of corruption, adopting a "zero tolerance" approach to corruption and conducting its activities in accordance with the highest professional and ethical standards in the context in which it operates. It equips itself with tools to spread awareness on the subject, train its employees and a specific Policy (*Ref. to Anticorruption Group Policy*).

INTERNATIONAL REFERENCE STANDARDS

The integration of social sustainability within the Lavazza business model is based on a solid body of procedures, constantly updated and adequate, which the Group has adopted with reference to the conduct of a responsible business and sustainability: from the Code of Ethics, to the Commitments on Human Rights and Children's Rights, up to the Code of Conduct for suppliers, acceptance of which is required of each supplier of the Group.
By joining the UN Global Compact, the Group is committed to achieving the United Nations Sustainable Development Goals, promoting, and adopting the ten principles relating to human rights, labour, the environment, and the fight against corruption for business sustainability.

The Group's values, as outlined in the procedure, are demonstrated through a thoughtful approach guided by international standards, such as:

- The United Nations Guiding Principles on Business and Human Rights (UNGPs).
  UN Guiding Principles on Business and Human Rights.
  https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf
- The UN Universal Declaration of Human Rights.
  International Bill of Human Rights.
  International Bill of Human Rights | OHCHR
- The Fundamental Conventions of the International Labour Organization (ILO).
  The Fundamental Conventions of the International Labour Organization **(ILO);**
  https://www.ilo.org/international-labour-standards/conventions-protocols-and-recommendations
- UN **Convention** on the Rights of the Child.
  Convention on the Rights of the Child.
  https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child
- UN **Convention** on Women's Rights.
  Convention on the Elimination of All Forms of Discrimination against Women; https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-elimination-all-forms-discrimination-against-women
- UNICEF's Children's Rights and Business Principles, **the UN Global Compact and Save the Children**.
  Children's Rights and Business Principles | UNICEF
- The **OECD Guidelines** for Multinational Enterprises.
  OECD Guidelines for Multinational Enterprises.
  MNE Guidelines - Organization for Economic Co-operation and Development
- Principles of the United Nations Global Compact.
  The Principles of the United Nations Global Compact.
  Homepage | UN Global Compact

The Group is committed to complying with applicable laws while striving to adhere to the highest standards available.

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OPERATIONAL GUIDELINES

About the Group's various supply chains, in which the main human rights risks lie, the approach adopted takes the form of the following actions:

- **Risk and impact assessment**: Lavazza periodically updates the analysis of its risks, opportunities and sustainability impacts along all its main value chains, according to the approach indicated by the ESRS standards of the European *Corporate Sustainability Reporting Directive* and in collaboration with the Enterprise Risk Management (ERM) Department and Group Compliance.-This analysis shows where the Group's core business activities, assets, and countries are most likely to negatively affect employees, consumers, local communities, and supply-chain workers, and highlights areas at risk of regulatory non-compliance.
- **Supplier assessment**: Suppliers are chosen using an assessment system that also incorporates sustainability criteria. This system gives ESG performance of each relevant supplier.
- **Audit program:** Specific ESG audits are scheduled either for strategic suppliers or for those with the greatest potential for improvement in their sustainability performance. The scope of the annual audit plan is subject to continuous review and expansion to ensure increasing coverage and effective monitoring.
- **Improvement plans and supply chain projects:** Sustainability audits are followed by specific improvement plans for the suppliers, which may impact on both its workers and possibly the local community affected by the business relations between Lavazza and the supplier concerned.
- **Collaborative and multi-stakeholder approach:** the Group also envisages, where appropriate, the implementation of supply chain projects in addition to the improvement plans, which push the supplier to align with the Group's values.

STAKEHOLDER ENGAGEMENT

The Group respects the rights of local communities and contributes to their development, promoting the socio-economic growth of the contexts in which it operates.

The Group actively collaborates with suppliers, coffee producers, employees, customers, public authorities, and local communities to strengthen a shared culture of human rights in line with the social role of the company. The Group therefore expects all stakeholders to make appropriate efforts to identify actual or potential negative impacts on human rights and the environment within their business activities and upstream supply chains, and to take measures to prevent, mitigate, eliminate, or remedy them.

The Group's approach is also based on constant and productive collaboration and active participation in key international and pre-competitive working groups on the topic of business ethics, embracing opportunities to develop a broader understanding of human rights values and promoting them within its sphere of influence.

Lavazza periodically informs its stakeholders about the activities conducted and the performance recorded, primarily through *the Group's* Annual Report, the Sustainability Report, and the website.

GOVERNANCE AND IMPLEMENTATION

The ultimate responsibility for the implementation of the Policy lies with the Board of Directors of the Parent Company Luigi Lavazza S.p.A. The Innovation, Sustainability & Institutional Relations Department, in collaboration with the Compliance, Human Resources, Health and Safety, Sustainable Procurement and Coffee Responsible Sourcing Departments, supervises implementation, promotes training activities, and verifies the effectiveness of the measures adopted.

Due diligence is part of risk management and is regularly reviewed for ongoing improvement. Policy updates are made public to inform stakeholders.

REPORTING MECHANISMS

Lavazza Group provides all stakeholders with a **Whistleblowing system** to report illegal conduct or irregularities, guaranteeing anonymity and confidentiality, in accordance with the provisions of the *Whistleblowing Policy*. It represents the maximum commitment of the Lavazza Group to doing business transparently, in compliance with the Code of Ethics. If stakeholders, whether internal or external, believe that a human rights violation has occurred, they can report it via the Digital Platform accessible from the Lavazza website Lavazza | Home.

All provided information—such as the identities of the whistleblower, the alleged wrongdoer, and anyone mentioned in the reports—is kept strictly confidential. Reported cases are handled by the Group Compliance Department, which informs the Group Ethics Committee. The committee is then responsible for making decisions and taking any necessary actions.

GLOSSARY

Diversity, equity, inclusion, and non-discrimination: Promoting equal opportunities and valuing diversity, removing all barriers, and creating a non-discrimination environment.

Lavazza Group (or "Lavazza"): a group of companies comprising Luigi Lavazza S.p.A. and all legal entities directly or indirectly controlled by (or under common control with) Luigi Lavazza S.p.A., which are directed and coordinated by Luigi Lavazza S.p.A. when it acts as the parent company of the Group.

Forced or coerced labor: Any work or service required of a person under threat of punishment and for which the person has not volunteered.

Child labour: Any work performed by children that deprives them of their childhood, potential, and dignity, and that is detrimental to their physical and mental development.

Freedom of association and collective bargaining: The right of workers to freely join a trade union and to negotiate collectively without fear of intimidation or reprisals

Fight against corruption: Condemnation of all forms of active or passive corruption and creation of an ethical working environment.

Luigi Lavazza S.p.A.: the Italian parent company of the Lavazza Group.

Responsible marketing: Use of authentic, clear, transparent, and comprehensive methods and forms of communication, without manipulative or deceptive intent

Fair and decent remuneration: Adequate and competitive compensation that allows workers to maintain a decent standard of living.

Respect and protection of the environment: Commitment to reducing greenhouse gas emissions, protecting biodiversity, managing water and waste resources, developing a circular economy, and using low-impact materials

Health and safety: Maintaining a safe and healthy working environment by adopting high standards of risk prevention, assessment, and management.

Subsidiary (or "Company"): a company controlled directly or indirectly by Luigi Lavazza S.p.A.

Consumer protection: Process that ensures that the products sold are safe, their quality complies with Lavazza standards and the information provided in a transparent and accessible way.

Protection of personal data and privacy: Protection of privacy and security of personal information in accordance with applicable laws and standards