

HUMAN RIGHTS POLICY

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POLICY STATEMENT

SASMAT RETAIL S.L. (hereinafter, SASMAT RETAIL), on representation of its firm PDPAOLA, recognises that respect for Human Rights, within the framework of the UN Guiding Principles on Business and Human Rights, is a crucial aspect towards socially sustainable globalisation. In this regard, SASMAT RETAIL is committed to developing a company culture which implements a policy to promote and protect internationally recognised human rights and seeks to avoid complicity in human rights abuses.

SASMAT RETAIL's policy is based on:

- The International Bill of Human rights which includes:
 - The Universal Declaration of Human Rights
 - The International Covenant on Civil and Political Rights
 - The International Covenant on Economic, Social and Cultural Rights
- The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, including the eight fundamental conventions.¹

SCOPE OF APPLICATION

This policy applies to SASMAT RETAIL. The Company also expects its suppliers and business partners to respect these provisions and encourages them to adopt similar policies in their own business.

PROVISIONS ON HUMAN RIGHTS FOR WORKERS

NO FORCED LABOUR

SASMAT RETAIL prohibits the use of forced or compulsory labour in all its forms including, but not limited to forced, bonded, involuntary prison labour or any other form of modern slavery or human trafficking.²

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

SASMAT RETAIL respects its employees, without distinction whatsoever, have the right to establish and join organizations or trade unions of their own choosing and to bargain collectively without fear of reprisal, intimidation, or harassment.

Where employees are represented by a legally recognized union, SASMAT RETAIL is committed to establishing a constructive dialogue with their freely chosen representatives. SASMAT RETAIL is committed to bargaining in good faith with such representatives.³

¹ The ILO Governing Body has identified eight "fundamental" Conventions, covering subjects that are considered to be fundamental principles and rights at work: (1) Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87), (2) Right to Organize and Collective Bargaining Convention, 1949 (No. 98), (3) Forced Labour Convention, 1930 (No. 29) and its 2014 Protocol, (4) Abolition of Forced Labour Convention, 1957 (No. 105), (5) Minimum Age Convention, 1973 (No. 138), (6) Worst Forms of Child Labour Convention, 1999 (No. 182), (7) Equal Remuneration Convention, 1951 (No. 100) and (8) Discrimination (Employment and Occupation) Convention, 1958 (No. 111).

² This provision is consistent with ILO Conventions No. 29 and No. 105 and Principle Four of the UN Global Compact.

³ This provision is consistent with ILO Conventions No. 87, No. 98 and No. 135 and Principle Three of the UN Global Compact.

OCCUPATIONAL SAFETY AND HEALTH

SASMAT RETAIL guarantees a safe and hygienic working environment and comply with applicable safety and health laws and regulations.⁴

CHILD LABOR AND YOUNG WORKERS

SASMAT RETAIL prohibits the admission to employment or work of any person under the age of 16.⁵

WAGES

SASMAT RETAIL compensates its workers according to industry standards, compliance with applicable minimum wage laws and/or collective bargaining agreements, whichever is higher.⁶

WORKING HOURS

SASMAT RETAIL guarantees that normal working hours and overtime are aligned with ILO conventions, the applicable law, or the collective bargain agreements, if the latter affords greater protection for the workers.

NO DISCRIMINATION

SASMAT RETAIL rejects any kind of discrimination in hiring, compensation, remuneration⁷, access to training, promotion, working hours, holidays, security, working conditions, termination or retirement based on race, caste, national origin, religion, creed, age, gender, marital status, sexual orientation, physical or mental disability, union membership or political affiliation.⁸

NO HARSH OR INHUMANE TREATMENT

SASMAT RETAIL ensures that all employees are treated with respect and dignity and guarantee a workplace free from violence and harassment.

No physical or disciplinary abuse, threat of physical, sexual, or other harassment, or any other form of intimidation or coercion will be undertaken or tolerated.

HUMAN RIGHTS AND SASMAT RETAIL STAKEHOLDERS

For an effective implementation of its policy, SASMAT RETAIL has identified the following stakeholders as priorities due to the level of control and influence it holds over them:

EMPLOYEES

SASMAT RETAIL is committed to respect, comply with, and promote the human rights of all its employees, including applicable national laws and the ILO's Declaration on Fundamental Principles and Rights at Work, including the eight fundamental conventions.

⁴ This provision is consistent with ILO Convention No.155.

⁵ This provision is consistent with ILO Conventions No. 138 and No. 182 and Principle Five of the UN Global Compact.

⁶ This provision is consistent with ILO Conventions No. 95 and No. 131.

⁷ Equal remuneration is regulated by the ILO Convention No.100 – Equal Remuneration Convention, 1951 –

⁸ This provision is consistent with ILO Conventions No. 111 and Principle Six of the UN Global Compact.

SASMAT RETAIL also requires its employees to respect, comply with and promote human rights in their respective fields of activity, as outlined in its SASMAT RETAIL Code of Conduct.

SUPPLIERS

Productive employment and decent work are key elements to achieving a fair globalization and poverty reduction. With this in mind, SASMAT RETAIL is committed to trading responsibly and creating a positive impact on society and works with its business partners and suppliers to ensure that all people who create its products are treated with respect and dignity.

SASMAT RETAIL expects all its suppliers who produce or supply goods and services to the company to respect human rights and labour practices, environmental practices, transparency, and ethical business practices, as outlined in its Supplier Code of Conduct.

CUSTOMERS

SASMAT RETAIL is committed with its millions of customers around the world to identify, prevent and mitigate the negative human rights impacts related to its activity, throughout the entire life cycle of the product and its business relationships.

COMMUNICATION AND IMPLEMENTATION

The Human Rights Policy will be made available to all personnel, business partners and other SASMAT RETAIL stakeholders and the necessary actions will be conducted for its adequate communication and training to ensure its understanding and implementation throughout the company.

UPDATE AND REVIEW

Developing a Human Rights Policy is a continuous and dynamic process due to human risks may change as global situation and operational context evolve or business model changes. In consequence, SASMAT RETAIL's Human Rights Policy will be subject to review with the aim of keeping it up to date.

WHISTLE BLOWING CHANNEL

SASMAT RETAIL provides its suppliers, third parties and its employees with the following means to carry out communications under this Policy, either containing non-compliance allegations or consultations related to its interpretation or application.

e-mail: Ethics@pdpaola.com

Address: Plaza Emili Mira 4, 08022, Barcelona (SPAIN)