

Good Social Practices Policy



Our Commitments

Work Environment

Grupo Lucci promotes a comprehensive and collaborative work environment in order to direct the commitment and personal effort towards the attainment of Grupo Lucci's shared goals. This environment aims to achieve organisational goals as well as support people's comprehensive development and the attainment of their personal goals. Our commitment consists in providing a safe and healthy workplace, both in physical and psychological terms, where there is no discrimination, violence or harassment of any kind. We make sure that the necessary safety guarantees are met for every employee, respecting every collaborator's privacy and dignity. This commitment is shown in our compliance with all the applicable legal regulations and in our requirement that our suppliers and contractors meet similar conditions in terms of responsibility.

Child Labour

At Grupo Lucci, we comply with all the applicable labour laws prohibiting any kind of child labour. We do not allow any kind of activity which endangers children's and adolescents' health and personal development or interferes with their education. Fundación Vicente Lucci, together with the company, promotes children's and adolescents' rights by means

of values education initiatives and projects that cooperate with other organisations. We are committed to child labour eradication and we belong to **the Network of Companies against Child Labour**, under the purview of the **Office of the Secretary of Labour, Employment and Social Security** and with the support of the **CONAETI** (Argentine Commission for the Eradication of Child Labour) and **UNICEF**. The **CONAETI**, created in 2000, coordinates and supervises any efforts towards child labour eradication and the protection of adolescent labour together with various ministries and representatives from the **ILO** and **UNICEF**. Since 2019, the provinces also participate in this commission in order to address this issue at a federal level. Our Good Social Practices Policy is in accordance with local and international regulations and strictly complies with the conventions established by the **ILO (International Labour Organization)**, such as: 111 on discrimination, 138 and 182 on minimum age and child labour, 29 and 105 on forced labour, 87 on freedom of association, 98 on collective bargaining, 100 on equal remuneration and 99 on minimum wages, which guarantees our recruitment processes are transparent and free from any kind of discrimination.

Safe and Healthy Workplace

Our collaborators' health and safety is a key priority. We implement policies and practices aimed at ensuring their maximum physical, mental and social well-being. That is why we make continuous efforts to train them on the prevention of occupational accidents, making sure workers carry out tasks based on their physiological and psychological skills. We meet the highest applicable standards in terms of safety, keeping a workplace which minimises any kind of accident risks and exposure to hazardous agents. In addition, we work together with our employees to identify and manage potential hazards by providing trainings and the necessary protection equipment to guarantee a safe and responsible workplace.

Freedom of Association and Collective Bargaining

At Grupo Lucci, we respect our employees' right to associate to a trade union of their own choice, without being afraid of any kind of retaliation, intimidation or harassment. Every worker has the right to collective bargaining through their trade unions representing them before private and public entities. The employees who are represented by legally recognised trade unions have access to appropriate channels for permanent and constructive dialogue with their representatives. We always ensure that there is a bona fide negotiation in order to keep social peace and facilitate the resolution of any work conflicts. In addition, any employee, by means of their trade union representatives, can file and make any complaint they deem relevant and such situation will not be regarded as slander and they will not be subject to disciplinary or personal sanctions since they are exercising their lawful right of petition.

Working Hours, Wages and Benefits

In every Grupo Lucci's company, we strictly adhere to the working hours set for in the collective bargaining agreements and in local, national and international labour regulations.

Working hours must not exceed those set forth in such agreements, and overtime is always voluntary and regulated by the law in force. We offer our employees professional development opportunities by means of training programs based on their needs, and we guarantee that remunerations are made in due time and manner based on the applicable wage scales. We also respect all the benefits established for our collaborators, ensuring a fair and equitable treatment.

Forced Labour and Human Trafficking

In strict compliance with the applicable legal regulations, we prohibit any kind of forced labour, debt bondage, slave labour and human trafficking. We guarantee that no involuntary work is performed and that employees are free to leave the company when

they want to. At our companies, we do not withhold any personal document belonging to our employees, thus ensuring that they are not subject to coercive practices.

Discrimination

Grupo Lucci promotes a work environment based on diversity and respect. We do not tolerate any kind of discrimination based on sex, gender, origin, race, age, religion, ideology or any other kind of discrimination. Recruitment takes place by means of job offers where we look for profiles that meet the specific needs required for the position. Hiring formalises through interviews where we explain the responsibilities of the position, the conditions and the remuneration. Professional growth is based on each collaborator's performance, skills and experience, which guarantees equal opportunities and avoids discrimination.

Confidentiality

All the information which collaborators have access to when performing their tasks is regarded as confidential. Employees are responsible for treating and protecting non-disclosed, authorised and/or public information. This includes technical and financial data, acquisition plans, new products, inventions, techniques, personal information about our employees, agreements, expansion plans, financial operations and other corporate developments.

Confidentiality is compulsory and must be observed pursuant to Article 85 of the Employment Contract Law. Confidential information must not be used to provide consultancy services to third parties or for personal purposes.

Business Integrity

Grupo Lucci conducts its businesses with integrity and in accordance with the applicable laws. We prevent any kind of bribe and fraudulent practices, and we have appropriate systems to monitor and control the actions guaranteeing legal compliance with and respect for human rights. We implement an Integrity Program in accordance with Law 27,401 on Criminal Liability of Legal Entities, ensuring accountability in the management and operations of our businesses.

Compliance with Applicable Laws and Regulations

We require that our suppliers also observe the applicable law and share our policies. We expect that they work in accordance with the requirements set forth in environmental, health, and occupational safety laws, as well as those established by our organisation. We promote sustainable practices throughout our value chain, which comprises employees, customers, suppliers and the environment, thus fostering responsible and beneficial business relations for the community.

Business Loyalty

Grupo Lucci values free competition and strongly believes that the best results are achieved in an ethical context. We support every control, supervision and monitoring activity that promotes business practices which ensure loyal competition between the agents of the market where we operate. Our policy consists in keeping high integrity and accountability standards in all our business activities.

Communication

At Grupo Lucci, we promote clear, precise and direct communication in all our interactions, either internal or external.

This communication policy applies to all the relations with our collaborators, customers, suppliers, contractors and consultants, ensuring transparency and effectiveness in all our processes.

Code of Ethics

Our Code of Ethics defines Grupo Lucci's corporate culture and represents our daily decisions and actions. The Values and the Code of Ethics, together with the underlying policies and operational procedures of each management department, constitute our commitment to responsible corporate practices. The Code of Ethics guides our behaviour and ensures our practices are in line with our principles.

Línea Ética

Grupo Lucci has an Ethics Hotline which promotes transparency in the Good Social Practices, the Code of Ethics and the Company's Values.

The following channels are available to make complaints and suggestions:

Web channel: <https://ethicshotline.grupolucci.com.ar>

Phone number: +54 381 4515 500 Ext.:5563

Main office: Ruta 302 Km.7 Cevil Pozo – Tucumán

Through these channels, people can report anonymously any irregularity or offence affecting our business group. Every complaint is properly dealt with, guaranteeing a detailed follow-up and the search for a solution to the situation.

Accuracy and Integrity in the Financial and Accounting Books and Reports

Our companies' accounting books are prepared based on the applicable legal regulations and requirements set forth by the Public Registry of Commerce. Such books are crucial in order to make business decisions and they must comply with the applicable law. Accuracy and integrity in these books is key to ensure transparency and accountability before employees, customers, suppliers and authorities.

Sales

Every sale made by Grupo Lucci's companies observes local, national and international regulations and rules. Every transaction is invoiced and registered in the relevant fiscal period. In this way, we guarantee that customers are not overcharged or undercharged in relation to the applicable prices and previously established conditions.

Purchases and Payments

Every payment our companies make must be duly supported by the relevant documentation. Payments to attorneys, consultants, advisors, and other professionals are made by check, bank draft or any other supported transfer, and they must always observe the established procedures and guidelines.

Environment

Grupo Lucci is committed to environment protection and preservation. We invest in technology and implement practices that aim at minimising the environmental impact of our operations. We observe all the applicable environmental laws and regulations and work proactively to ensure our activities are sustainable and respect natural environment.

Community

Our company is actively involved in community development through Fundación Vicente Lucci, which manages projects aimed at improving the local quality of life. We contribute to the educational, cultural and work development of the communities where we operate, collaborating with public entities, companies, and other institutions in order to maximise the social positive impact.

Summary

Grupo Lucci is committed to conducting its activities with the highest ethics and social responsibility.

We respect human rights and comply with laws in all our operations, promoting a fair work environment, a sustainable environment and a positive impact in the communities.

In spite of the fact that laws and economic conditions vary around the world, we consider our shared values and principles as the basis in order to make business relations and throughout our value chain.