

OUR POLICY FOR THE PROMOTION AND PROTECTION OF HUMAN RIGHTS

YEAR 2026-2027 rev.1

1- APPROACH AND COMMITMENT

Respect for human rights and the promotion of the well-being of employees are deeply rooted in the values and founding principles of Poggipolini. Poggipolini believes in sustainable business development and considers respect for human rights and proper adherence to labour rights as an integral part of responsible business behaviour. In line with the provisions of the Code of Ethics, Poggipolini recognizes people as an indispensable element for the development of the Company and promotes its skills, skills, commitment and creativity, protecting work, health and safety and ensuring working conditions and a safe and secure environment, as well as a system of values and principles regarding legality, transparency and sustainable development.

2- OBJECTIVE

Recognising that human rights issues are vast and complex and require a comprehensive approach, the aim of this document is to define, structure and develop a clear approach to the subject and promote the principles contained in this policy, including through continuous training for Poggipolini people and suppliers, with particular attention to health and safety aspects, business integrity and ethics, inclusion and diversity, the protection of the rights of minorities and Indigenous Peoples, respect for local communities, natural resources, and legitimate land, forest and water rights, as well as broader sustainability issues.

The human rights policy of Poggipolini s.p.a. aims to define the fundamental principles, behavioural rules and responsibilities in the field of human rights that the Company assumes as an imperative and binding value.

3-GOVERNANCE

This policy for the promotion and protection of human rights is adopted by the Board of Directors of Poggipolini s.p.a. to supplement and complete the Code of Ethics of the Company and the Model of Organization, Management and Control ex D.Lgs. n. 231/01.

Supervision of the implementation of the Poggipolini Principles relating to Human Rights is the responsibility of the Management. Our Policy is also subject to the control of the Board of Directors of Poggipolini, including the CEO.

4-NATIONAL AND INTERNATIONAL REGULATORY FRAMEWORK

This Policy is a manifesto that commits the Company to promoting the protection of human rights for all persons working in its "value chain". Although it operates mainly in Italy, where the regulatory framework regulates respect for fundamental human rights, Poggipolini undertakes to respect and actively disseminate the principles set out in the regulations and standards issued by international reference organizations, including:

More specifically, with respect to supranational sources, Poggipolini s.p.a. applies and promotes the founding principles of the following conventions and declarations of European and international law:

- **the United Nations International Charter of Human Rights**, including The Universal Declaration of Human Rights (1948) and subsequent international conventions on civil and political rights and economic, social and cultural rights;
- **the Declaration on Fundamental Principles and Rights at Work and the eight Fundamental Conventions of the International Labour Organisation (ILO)**;
- **the United Nations Conventions** on Women's Rights, the Elimination of All Forms of Racial Discrimination, the Rights of the Child and the Rights of Persons with Disabilities;
- **the European Convention on Human Rights** (1950).

In addition, Poggipolini s.p.a. complies with Italian regulations and the countries in which it operates, such as, without presumption of exhaustiveness:

- **Laws on equal opportunities;**
- **Laws on anti-corruption;**
- **Laws on the protection of trade union freedom in the workplace;**
- **Workplace health and safety laws;**
- **Laws on privacy protection and protection of personal data.**

5- INTERNAL REFERENCES

The following internal documents are relevant and support the principles stated in our Policy:

1. **Code of Ethics** of Poggipolini
2. **Model 231 and Whistleblowing Procedure** (Annex 7) of Poggipolini
3. **National contract CCNL metalworking industry**
4. **Quality, Environment and Safety Management System**
5. **Additional internal voluntary standardisation documents** relevant to the regulation of the Company's operational activities (for example in the areas of Health and Safety, Environment, Human Resource Management, IT, Reporting Management, Privacy)

6- OUR COMMITMENTS

- **Refusal of child labour:** Poggipolini s.p.a. does not use any form of child labour, refusing the employment of staff under the minimum age for entry into employment provided for by the law of the country where the work is performed;
- **Refusal of Forced Labour:** Poggipolini s.p.a. rejects all forms of forced or compulsory labour and guarantees working conditions in accordance with the laws and regulations in force. The work, both ordinary and extraordinary, is free of any form of physical and/or psychological coercion;
- **Commitment against harassment and mobbing in the workplace:** Poggipolini S.p.a. is committed to ensuring a fair and professional working environment for all its workers, regardless of the type of work relationship and the roles held; no form of sexual, personal or other harassment or offence is tolerated. Each Recipient respects the personal dignity, privacy and personality rights of any individual and works with women and men of different nationalities, cultures, religions and races;
- **Non-discrimination and equal opportunities:** Poggipolini s.p.a. considers unacceptable any form of discrimination understood as distinction, exclusion or preference having the effect of denying or altering equality of opportunity or treatment in employment or profession. Poggipolini's goal is to consolidate a working environment characterized by the absence of racial, cultural, ideological, sexual, physical, moral, religious or other discrimination.

For Poggipolini, diversity is a strategic element for the company's competitiveness and the development of its people. Poggipolini believes that teams with different skills, experiences and backgrounds enrich the working environment and stimulate creativity, fostering a more effective leadership style and fostering an increasingly open corporate culture;

- **Fair and favourable working conditions:** Poggipolini s.p.a guarantees a fair remuneration in accordance with the minimum wage requirements laid down in collective agreements and the relevant legislation, promoting active policies to prevent and combat the gender gap and to support the employment of people with disabilities. Moreover, Poggipolini, aware of the challenges posed by the reconciliation of work and private life with the right to rest and free time, promotes a fair balance between work and private life, applying strategies of flexibility on the spot and working time;

- **Freedom of association and collective bargaining:** Poggipolini s.p.a. recognizes the right to free association and collective bargaining and is actively committed to combating any form of abuse or discrimination against individuals engaged in activities of organization or representation of workers;

- **Health and Safety at Work:** Poggipolini s.p.a. is committed to promoting a corporate culture that guarantees healthy and hygienic working conditions. It also considers health and safety protection to be fundamental values that characterise the company as a whole and adopts high standards of assessment, prevention and management of the related risks. The prevention of risks to health and physical integrity applies in the workplace, towards employees, and more generally in the activities of Poggipolini in relation to all stakeholders;

- **Respect for the environment and local communities:** Poggipolini s.p.a. undertakes to comply with the laws on the environment and to operate with respect for the environment, the territory and local communities, investing in the research and development of technologies that enable the highest standards of environmental and energy sustainability to be achieved;

- **Respect for the rights of minorities and Indigenous Peoples:** Poggipolini S.p.A. recognises and respects the rights, dignity, identity, cultures, traditions and heritage of minorities and Indigenous Peoples. The Company is committed to conducting its business activities in accordance with internationally recognised human rights, promoting inclusion, equal opportunities and non-discrimination throughout its value chain.

- **Respect for land, forest and water rights and prevention of forced eviction:** Poggipolini S.p.A. is committed to respecting legitimate rights relating to land ownership, land use, forests and water resources. The Company does not support or contribute to unlawful land acquisition, forced eviction or the deprivation of access to natural resources and expects the same commitment from its suppliers and business partners.

- **Responsible use of private or public security forces:** Where private or public security providers are engaged to protect the Company's personnel, facilities or assets, Poggipolini S.p.A. requires that such services operate in full compliance with applicable laws and internationally recognised human rights standards, respecting human dignity and prohibiting intimidation, harassment, excessive use of force or any form of abuse.
- **Privacy:** Poggipolini s.p.a. undertakes to respect the right to privacy and the protection of data and personal information of all parties involved in its activities as well as to process data and personal information in accordance with the dignity, the confidentiality and personal identity of the interested parties, with particular attention to customers and in full compliance with the regulations in force;
- **Culture and skills:** Poggipolini s.p.a. is committed to promoting the development of human capital through the implementation of specific training initiatives aimed at the professional and cultural growth of its employees and those involved in the activities of Company.

7- SCOPE AND ADDRESSEES OF THE POLICY

This policy applies to all personnel of Poggipolini s.p.a., as well as to all those who work on its behalf or on its behalf, within the scope of the activities carried out and within the limits of their responsibilities.

More specifically, the subjects addressed by this Policy are:

- i. the members of the Board of Directors, who set the objectives of the company in accordance with the principles of this policy;
- ii. the members of the supervisory bodies, which ensure compliance with and compliance with the content of the policy;
- iii. managers, who must implement the values and principles contained therein;
- iv. employees, who must adapt their behaviour to the principles and objectives of this policy;
- v. external collaborators, who are required to align their conduct with the principles of the policy;
- vi. other third parties with whom the Company maintains contractual relations for the achievement of the company's objectives, which include the provision of work, including temporary work, or carrying out activities in the name and on behalf of the Company, such as to establish a fiduciary relationship with the latter.

The policy is also applied in the context of the activities carried out by the Company abroad, even with the limitations and differences existing in the regulatory, economic and social aspects. Poggipolini s.p.a. also promotes the principles contained in this Policy throughout its value chain and encourages suppliers, contractors, business partners and other stakeholders to adopt equivalent standards regarding the protection of human rights.

8- COMMUNICATION

This policy will be made available to all stakeholders, both internal and external, through publication on the company's website. All Recipients are required to read, understand and observe it.

Poggipolini s.p.a. also undertakes to provide the most appropriate knowledge of this policy by disseminating it to interested parties through appropriate and appropriate communication and training activities.

9- APPLICATION

Within the limits of their competence, all the Recipients as indicated above, are required to align their behavior to the principles and values expressed in this policy, as well as to be subject to verification and control according to internal procedures.

All Poggipolini staff are obliged, without exception, to adapt their behaviour to the principles set out in this Policy, both in the workplace and during external events related to work (meetings, social events, travel).

Subjects with supervisory and coordination functions are also required to supervise compliance with the principles of this policy by subjects and take appropriate measures to prevent, identify and report potential violations and criticalities.

Under no circumstances may the belief or claim to act in the interest of the Company justify actions contrary to the principles expressed in this corporate policy, or to internal laws, regulations and procedures.

10- PENALTY SYSTEM

Poggipolini s.p.a. undertakes to prevent, and where not possible, to sanction, any conduct that may violate this policy put in place by any recipient, employee or third party.

The violation of the principles set out in this policy by the employees undermines the relationship of trust established with the Company and may lead to disciplinary and compensatory actions in accordance with the applicable law and collective bargaining.

With respect to Recipients other than employees, Poggipolini s.p.a. provides in the relevant contracts the right to terminate the relationship in case of conduct detrimental to the principles or values contained in this policy.

11- ALERTS

Poggipolini makes available appropriate reporting channels (official App "ONE") in order to improve its ability to identify and analyze the real, or even potential, impacts on human rights and take timely corrective measures, always taking care to ensure the confidentiality of the identity of the reporting person from receipt of the communication and in any subsequent contact.

All stakeholders can report, even anonymously, through these channels, any violation or suspicion of violation of this policy on Human Rights.

Reports can be sent to the Supervisory Body of Poggipolini s.p.a. also verbally, as well as by post and by e-mail to the following address:
organismodivigilanza@poggipolini.it

For each report is guaranteed the absolute confidentiality of the reporting agent in good faith, and is in any case insured against any form of retaliation, discrimination, or penalization during or after the inspection activity that may result from his report.

It remains in any case without prejudice to the prohibition of discrimination and retaliation against the reporting agent in good faith.

12- REVISION

This Policy will be reviewed periodically to ensure its effective implementation and adequacy to social changes, regulatory changes and organizational changes within the Company.

The revisions will be subject to the approval of the Board of Directors of Poggipolini. This Policy shall also be reviewed whenever significant regulatory developments, updates to internationally recognised human rights standards or substantial changes in the Company's activities, organisation or human rights risk assessment occur.

San Lazzaro di Savena, 11/06/2026

The High Management

San Lazzaro di Savena, 29/06/2026