

## HUMAN RIGHTS POLICY COMMITMENT TO RESPECT HUMAN RIGHTS AND DIVERSITY

### COMMITMENTS

For Bracchi S.p.A. (hereinafter "Bracchi") and its subsidiaries (hereinafter "Group"), respect for human rights is a fundamental value, on which the corporate culture and overall strategy are based and represents a priority in all business areas. For this reason, the Bracchi Group is actively committed to promoting awareness of the importance of the principles expressed in this Policy.

The Group's strong commitment is also reflected in the Code of Ethics, in which human rights are treated as one of the central themes.

Through the adoption of a Human Rights Policy (hereinafter also "Policy"), the Group reaffirms its commitment to respecting human rights and diversity, strengthening its commitment to protecting fundamental rights and ensuring that all activities are conducted in compliance with international standards in this area.

Our policy is inspired by and adheres to the following international references:

- The **United Nations Universal Declaration** of Human Rights.
- The **Ten Global Compact Principles** of the United Nations .
- The **United Nations Guiding Principles on Business and Human Rights**.
- The **fundamental Conventions of the International Labour Organization (ILO)**.
- The **European Convention on Human Rights**.

The Group undertakes to fully respect all the principles contained in these conventions.

### ILO Convention

Bracchi shares the four fundamental pillars of the ILO's work, as set out in the Declaration on Fundamental Principles and Rights at Work:

- Freedom of association and the right to collective bargaining
- Elimination of all forms of forced or compulsory labor
- Effective abolition of child labor
- Elimination of all forms of discrimination in employment and occupation

### OBJECTIVES AND SCOPE

Bracchi is committed to adopting and disseminating the human rights principles set out in this Policy and in other documents, including the Code of Ethics and other policies adopted by the Group.

With this Policy, Bracchi reaffirms its values and guidelines that must guide the choices and behaviors of all people working in the Group, regardless of their level, experience, or position, whether they are employees of Bracchi or its

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subsidiaries, in all countries where the Group is active, provided that they operate within the legal boundaries of the Group.

The Group's values, set out in the Code of Ethics, recall the human rights principles expressed in this Policy:

#### **ETICS**

*Act with integrity, honesty and respect, placing collective interests above individual ones.*

#### **QUALITY**

*Striving for excellence through high quality, with the aim of achieving corporate goals.*

#### **PROACTIVITY**

*Anticipating changes and delivering innovative solutions that go beyond expectations.*

#### **MEMBERSHIP**

*Be an integral part of the BRACCHI Group and feel proud in recognizing yourself and being recognized as its representatives.*

#### **VALORIZATION**

*Dedicate yourself to enhancing the contribution of people, enhancing their performance, skills, motivation and potential, to achieve company objectives.*

We will monitor our progress towards achieving the following targets by 2027:

- elimination of accidents in the workplace – “ZERO ACCIDENTS”;
- increase in the total number of training hours by 10% compared to the 2023 base year .

Highly qualified personnel and high process standards represent a fundamental asset for the Group's success and are key factors within an extremely complex value chain.

The strengthening of attention to human rights, especially in the workplace, demonstrates how for the Group people are at the center of every business process and every economic and commercial relationship.

The Group also encourages its suppliers to adopt and respect this Policy.

For more information, we invite you to read the Supplier Code of Ethics.

## PRINCIPLES

### Forced labor and child labor

The Bracchi Group rejects the use of forced or compulsory labor and guarantees working conditions that comply with current laws and regulations. The performance of work, both ordinary and extraordinary, is a free expression of the will of the workers<sup>1</sup> and is free from any form of physical and/or psychological coercion.

The Bracchi Group rejects the use of any form of child labor and of people under the minimum age established by law<sup>2</sup>, as defined by the regulations in force in the countries in which the Group operates.

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<sup>1</sup> As defined by ILO Convention No. 29

<sup>2</sup> As defined by ILO Convention No. 138

## Freedom of association and collective bargaining

The Bracchi Group recognizes its employees' right to association for the defense and promotion of their interests, as well as the right to be represented by trade unions or other forms of representation, according to the legislation and practices in force in the various countries in which they are employed<sup>3</sup>

Collective bargaining is recognized as a privileged tool for determining the contractual rules and conditions of its employees, as well as for regulating relations between the individual company and trade unions.

The Bracchi Group is committed to ensuring that employee representatives are in no way penalized or subjected to any form of retaliation.

## Fair and favourable working conditions

The Bracchi Group believes that remuneration policies, benefits and working conditions must guarantee an adequate standard of living for all workers; for this reason, the Group promotes a working condition in which all employees receive fair and equitable compensation and benefits according to the type of work performed, the contractual classification and the country in which they are employed<sup>4</sup>.

In the Bracchi Group, the minimum wage for employees is not lower than that established by collective agreements and regulations in force in the various countries in which the Group operates.

## The importance of health and safety in the workplace

For the Bracchi Group, safeguarding fundamental human rights is essential in any manifestation of social coexistence, starting with the right to operate in environments and conditions suitable for ensuring the health and safety of workers. The Group, as indicated in the Policy on Environment, Health and Safety at Work, is committed to ensuring healthy and safe working conditions and to promoting the dissemination and consolidation of a culture of safety among all workers, including within the supply chain.

The Bracchi Group is committed to ensuring that all activities are planned and carried out in order to preserve the health and safety of workers and to guarantee the highest standards in this area.

## Rights of local communities

The Bracchi Group is committed to respecting the rights of local communities in the countries in which it operates and to reducing the social and environmental impact of the activities developed in its production sites. The Group contributes to the social and economic growth of communities and is committed to adopting behaviors that are respectful of the contexts in which it is located and to exert a positive influence on the territories. The Bracchi Group acts to build a solid relationship of cooperation with its stakeholders, with the aim of creating long-term value and opportunities for growth and development, as well as to promote open and transparent dialogue and relationships based on mutual trust.

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<sup>3</sup> As defined by ILO Convention No. 87.

<sup>4</sup> As defined by ILO Convention No. 100 and No. 131.

## DIVERSITY AND INCLUSION

### Non-discrimination and equal opportunities

Bracchi and the Group reject any form of discrimination based on ethnicity, skin color, gender, age, disability, sexual orientation, religion, political opinions, nationality, and social origin\*. Bracchi is committed to maintaining a work environment free from any form of violence or harassment.

(\* ) As defined by ILO Convention No. 11 .

For Bracchi, diversity represents a strategic element for the company's competitiveness and the development of its people. The Group believes that teams with different skills, experiences and backgrounds enrich the work environment and stimulate creativity, promoting a more effective leadership style and fueling an increasingly open corporate culture.

Non-Discrimination, Equal Opportunity and Inclusion permeate Bracchi's values.

For these reasons the Group is committed to:

- create an inclusive work environment that ensures respect, integrity, personal development and equal opportunities (e.g. training, development, career), not only for current employees, but also for potential ones.
- increase employee awareness of diversity and equal opportunities within the Group, including through the development of training programs and specific projects on diversity and inclusion.
- comply with rules and laws on equal opportunities, also with reference to the regulatory framework of the countries in which it operates and the best practices identified.
- promote the commitment of all Group employees to act with respect and integrity in every relationship with colleagues, customers, suppliers and all the actors with whom they interact.
- stimulate suppliers' attention to respect for human dignity expressed in the form of non-discrimination and protection of diversity.

## IMPLEMENTATION AND MONITORING

Bracchi is committed to disseminating the contents of this Policy also through training courses and dedicated events and to monitoring their effective implementation.

To ensure consistent behavior within the Group, Bracchi S.p.A will gradually equip itself with adequate tools in the different contexts and territories in which it operates.

In order to implement and monitor the commitments expressed in this Policy, as well as to optimize the effectiveness of the actions to prevent and mitigate negative impacts, the Group will adopt monitoring mechanisms for areas of potential risk.

Bracchi and the Group companies are committed to adopting a Supplier Code of Ethics to promote the sharing and respect of the fundamental principles of human rights also within the supply chain.

This policy is communicated to all employees, also through specific training sessions based on the areas of operation, roles and responsibilities, and is made available on the Bracchi corporate website to all stakeholders, including collaborators, suppliers and partners, so that there is full awareness and further impetus to the promotion of human rights as an integral part of the Group's system of values.

### Signaling mechanisms

Bracchi also provides the platform dedicated to whistleblowing for reporting any violations of human rights. The platform, suitable for ensuring the confidentiality of the sources and information that comes into possession, without prejudice to legal obligations, is accessible on the Bracchi institutional website for all stakeholders. It is also possible to send reports, following the methods provided for by the Reporting Procedure.

The Group guarantees that any report or complaint sent through the procedure indicated above will be taken into consideration.

### RESPONSIBILITY AND REVIEW

Bracchi will be responsible for monitoring and controlling the “Human Rights Policy – Commitment to respect human rights and diversity”.

The Policy will be subject to periodic reviews and validated by the Chief Executive Officer, in order to ensure its effective implementation and adequacy, and will be adapted to any changes in the external context.

The Policy and subsequent reviews will be subject to approval by the Bracchi Board of Directors.