HUMAN RIGHTS POLICY
COMMITMENT TO RESPECTING 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 areas of business. 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 its 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 referred to as the 'Policy'), the Group reaffirms its commitment to respect human rights and diversity, strengthening its commitment to protect fundamental rights and ensure that all activities are conducted in accordance 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 Principles of the UN Global Compact**.
- The **United Nations Guiding Principles on Business and Human Rights**.
- The **fundamental Conventions of the International Labour Organisation (ILO)**, with particular reference to **Convention No. 100 on equal remuneration and Convention No. 111 on non-discrimination.**
- The **European Convention on Human Rights** and the **Charter of Fundamental Rights of the European Union (Article 23).**
- The **Convention on the Elimination of All Forms of Discrimination against Women (CEDAW, 1979 – UN)**.

The Group undertakes to fully comply with 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 labour
- Effective abolition of child labour
- Elimination of all forms of discrimination in employment and occupation

OBJECTIVES AND PURPOSE

Bracchi undertakes to adopt and disseminate 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 conduct of all persons working in the Group, regardless of their level, experience, or position, whether they are employees of Bracchi or its subsidiaries, in all countries where the Group operates, provided that they operate within the legal boundaries of the Group.

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

ETHICS

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

QUALITY

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

PROACTIVITY

Anticipating change and offering innovative solutions that exceed all expectations.

MEMBERSHIP

Being an integral part of the Bracchi Group and taking pride in identifying with and being recognized as its representatives.

ENHANCEMENT

Dedication to enhance the contribution of individuals, strengthening their performance, skills, motivation and potential, in order to achieve company objectives.

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

- zero accidents in the workplace – "ZERO ACCIDENTS";
- 10% increase in the total number of training hours compared to the 2023 reference year.

Highly qualified personnel and high process standards are fundamental assets for the Group's success and are key factors within an extremely complex value chain. The increased focus on human rights, especially at the workplace, demonstrates how people are at the heart of every business process and every economic and commercial relationship for the Group. The Group also encourages its suppliers to adopt and comply with this Policy. For more information, please read the Supplier Code of Ethics.

PRINCIPLES

Forced labour and child labour

The Bracchi Group rejects the use of forced or compulsory labour and guarantees working conditions that comply with applicable laws and regulations. Both ordinary and extraordinary work is performed freely by workers[1] and is free from any form of physical and/or psychological coercion. The Bracchi Group rejects the use of any form of child labour and of persons below the minimum age established by law[2], as defined by the regulations in force in the countries where the Group operates.

[1] As defined by ILO Convention No. 29

[2] As defined by ILO Convention No. 138

Freedom of association and collective bargaining

The Bracchi Group recognizes its employees' right to form associations for the defence and promotion of their interests, as well as their right to be represented by trade unions or other forms of representation, in accordance with the legislation and practices in force in the various countries in which they are employed[3].

Collective bargaining is recognized as the preferred means of determining the contractual rules and conditions for employees, as well as regulating relations between individual companies and trade unions.

The Bracchi Group undertakes to ensure that employee representatives are not penalized or subjected to any form of retaliation.

Fair and favourable working conditions

The Bracchi Group believes that remuneration policies, benefits and working conditions should guarantee an adequate standard of living for all workers. For this reason, the Group promotes working conditions in which all employees receive fair and equitable remuneration and benefits according to the type of work performed, their contractual status and the country in which they are employed[4].

Within the Bracchi Group, the minimum remuneration of 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 all aspects of social coexistence, starting with the right to work in environments and conditions that ensure the health and safety of workers. As stated in its Environment, Health and Safety at Work Policy, the Group is committed to ensure healthy and safe working conditions and to promote the dissemination and consolidation of a culture of safety among all workers, including those in the supply chain.
The Bracchi Group is committed to ensure that all activities are planned and carried out with a view to preserve the health and safety of workers and guarantee the highest standards in this area.

Rights of local communities

The Bracchi Group is committed to respect the rights of local communities in the countries where it operates and to reduce the social and environmental impact of its activities at its production sites. The Group contributes to the social and economic growth of communities and is committed to behave in a manner that respects the contexts in which it operates and to exert a positive influence on the territories. The Bracchi Group works to build solid cooperative relationships with its stakeholders, with the aim of creating long-term value and opportunities for growth and development, as well as promoting open and transparent dialogue and relationships based on mutual trust.

[3] As defined by ILO Convention No. 87.
[4] As defined by ILO Conventions 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 colour, gender, age, disability, sexual orientation, religion, political opinions, nationality and social origin*.* Bracchi *is committed to maintain a workplace free from all forms of violence or harassment*.

(*) As defined by ILO Convention No. 111.

For Bracchi, diversity is a strategic element for corporate competitiveness and for the growth of its people. Teams that are diverse in terms of skills, experience and background enrich the working environment, stimulate creativity and promote more effective leadership styles, fostering an increasingly open and innovative culture.

In this context, promoting cultural, generational and gender diversity is a key objective, pursued through organizational and management practices based on respect for individual rights and freedoms, in line with the UNI/PdR 125:22 standard.

Bracchi is committed to promote the integration of all people, recognizing their unique characteristics in an inclusive, fair and respectful culture, and to act as a spokesperson for corporate social responsibility based on respect and appreciation of differences.

For these reasons, the Group is committed to:

- integrate D&I principles and promote equal opportunities in all phases of the human resources management cycle (planning, selection, development, assessment, career, mobility) by ensuring transparent and meritocratic processes;
- guarantee equal pay, preventing pay disparities between men and women in positions of equal role and responsibility;
- create an inclusive working environment based on the concept of zero tolerance towards all forms of discrimination and violence, which guarantees respect, integrity and equal opportunities for all current and potential employees. To this end, Bracchi adopts structured procedures for the prevention, reporting and management of inappropriate behaviour, in order to ensure a professional, fair, transparent and safe working environment.
- promote work-life balance through flexible organisational tools and policies that support parenthood.
- promote leadership that values the talents and unique qualities of each individual, recognizing diversity in gender, ethnicity, culture and religion as an asset that strengthens cohesion and makes the workplace more open, welcoming and secure.
- raise employee awareness of diversity and equal opportunities within the Group, including through the development of training programmes and specific projects on diversity and inclusion.
- comply with equal opportunity regulations and laws, including those applicable in the countries in which it operates, and best practices identified.
- encourage all Group employees to act with respect and integrity in all their dealings with colleagues, customers, suppliers and all other stakeholders with whom they interact.
- encourage suppliers to respect human dignity in the form of non-discrimination and protection of diversity.
- adopt inclusive internal and external communication that uses respectful and non-discriminatory language;
- Periodically monitor gender equality indicators and targets through internal audits, updates to the Strategic Plan, and transparent reporting.

IMPLEMENTATION AND MONITORING

The Management, together with the equal opportunities steering committee, is committed to disseminate the contents of this Policy through training courses and dedicated events, and to monitor its effective implementation.

To ensure consistent behaviour within the Group, Bracchi S.p.A. will gradually equip itself with appropriate tools in the various 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 actions to prevent and mitigate negative impacts, the Group will adopt mechanisms to monitor areas of potential risk.

Bracchi and the companies in the Group are committed to adopt a Supplier Code of Ethics in order to promote the sharing and respect of fundamental human rights principles, including within the supply chain.

This policy is communicated to all employees, including through specific training sessions tailored to their areas of operation, roles and responsibilities, and is made available on Bracchi's corporate website to all stakeholders, including collaborators, suppliers and partners, to ensure full awareness and further promote human rights as an integral part of the Group's value system.

Reporting mechanisms

Bracchi also provides a whistleblowing platform for reporting any human rights violations. The platform, which is designed to ensure the confidentiality of sources and information obtained, without prejudice to legal obligations, is accessible to all stakeholders on Bracchi's institutional website. Reports can also be submitted in accordance with the procedures set out in the Reporting Procedure.

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

RESPONSIBILITY AND REVIEW

The Equal Opportunities Steering Committee 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, updated in the event of regulatory changes or significant changes, validated by the Chief Executive Officer to ensure its effective implementation and adequacy, and disseminated to employees and stakeholders with a view to transparency, accountability and collaboration.

The Policy and subsequent revisions will be subject to approval by Bracchi's Board of Directors.

Revised on 21 October 2025