

HUMAN RIGHTS POLICY

22/12/2025 - Internal Audit



1. PREMISE

Respect for human rights is an **absolute value** for SACMI Group.

This principle is rooted in:

- the Group's **vision**: "to hand over a better company to future generations";
- the **Code of Ethics**, which formalizes principles of conduct and values that everyone must adhere to, together with compliance with laws, in the organization and conduct of business activities.

This policy reaffirms SACMI's **explicit commitment** to respecting all human rights—including civil, political, social, and economic rights—according to **universally recognized standards**¹ and in line with its values of **loyalty and integrity, freedom with responsibility**.

2. SUBJECT AND SCOPE OF APPLICATION

This policy applies to **all companies of SACMI Group**, with the aim of promoting awareness and respect among its employees, collaborators, and partners, throughout the entire **value chain**.

3. PRINCIPI

• HUMAN RIGHTS

SACMI recognizes the complexity and relevance of the issue of human rights.

It is committed to **promoting compliance with these principles** in every area of operation, in accordance with internationally recognized principles, the regulations in force in the various countries in which the company operates, and in keeping with its own ethical principles and values.

Watch furthermore, within the perimeter of its value chain and in the relationship with its stakeholders, to ensure that **it is not complicit in any abuse** in human rights matters.

• PROHIBITION OF FORCED LABOR

SACMI rejects any form of forced or coercive labor. No worker may be forced to perform work under threat or against their will.

The Group is committed to ensuring that all employees and suppliers operate **on a voluntary basis** and in compliance with the standards established by the ILO².

• CHILD PROTECTION AND PROHIBITION OF CHILD LABOR

SACMI recognizes the fundamental rights of children and, of course, **does not tolerate any form of child labor.**

It ensures the **effective protection of this right**, in compliance with local regulations and international standards, promoting access to education and the protection of minors from activities that could compromise their growth and development.

It is committed to ensuring that the same standards are **known, respected, and applied** by its suppliers and partners along the value chain.

¹ In particular, this policy is inspired by the following documents:

- *Universal Declaration of Human Rights* . United Nations General Assembly, 1948.
- *and Political Rights* . United Nations General Assembly, 1966 (in force since 1976).
- *and Cultural Rights* . United Nations General Assembly, 1966 (in force since 1976).
- *Labour Organization's Declaration on Fundamental Principles and Rights at Work* (ILO, 1998)
- *Principles of the UN Global Compact* . UN, 2004
- *United Nations Guiding Principles on Business and Human Rights* . United Nations Human Rights Council, 2011.
- *United Nations Sustainable Development Goals (UN Sustainable Development Goals)* . UN, 2015.

² International Organization of Labour.

- DIVERSITY AND EQUAL OPPORTUNITY

SACMI **combats all forms of discrimination in the workplace** and promotes an **inclusive and respectful environment**, free from any form of discrimination or harassment, particularly those based on ethnicity, gender, nationality, political opinions, sexual orientation, gender identity, age, disability or other personal characteristics, protected by law or relevant according to the principles and values expressed in the Code of Ethics. This commitment is reflected in **leadership** at every level of the organization: SACMI requires its managers to **create and maintain inclusive environments** and to actively promote diversity and equal opportunities within their teams.

- FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING, WORK-LIFE BALANCE POLICIES

SACMI Group supports the **right of workers to freely associate**, join unions, and engage in collective bargaining.

It promotes the **improvement of working conditions**, through the lever of open, transparent and constructive dialogue between the workers themselves, their representatives and the company.

It is committed to ensuring that all its employees receive fair and competitive remuneration, in line with local laws and industry standards.

It prioritizes the **continuity and longevity of the employment relationship**, in accordance with its Code of Ethics and the principle of intergenerational responsibility.

It encourages, consistent with the role and production activity, the adoption of **work-life balance policies** (e.g., smart working, personal services), also aimed at promoting the full inclusion of workers with particular personal and family needs or issues, applying the principle of **flexibility and work autonomy, freedom with responsibility** as elements leading to a greater productivity combined with a positive impact on the worker's well-being and, therefore, on the environmental, social, and economic sustainability of the business.

- HEALTH AND SAFETY

For SACMI, **workplace health and safety** are more of a **cultural** rather than a regulatory requirement. All Group companies must adhere to **common internal standards** regarding the health and safety of their workers, collaborators, and partners.

SACMI works towards the continuous **improvement** of aspects related to health and safety in the workplace, also involving the value chain (suppliers, customers) in the research and application of **best practices** in the field of Prevention and protection. This is achieved, in particular, through regular **risk assessments**, the implementation of structured systems for reporting and analyzing accidents and near misses, as well as through **ongoing training and updating** for employees and partners.

- PROTECTION OF THE ENVIRONMENT AND COMMUNITIES

SACMI considers the **protection of communities and the environment** to be an essential condition for the effective implementation and effectiveness of the policy, in line with its mission.

encourages the adoption of a **precautionary approach** to environmental issues, promoting a culture of responsibility and supporting the diffusion and development of **sustainable innovation**.

It supports ongoing dialogue regarding potential and actual environmental impacts with local communities and the areas where production activities occur.

- PRIVACY AND PERSONAL DATA PROTECTION

SACMI protects the **privacy rights of its employees and stakeholders**. Personal data is processed in compliance with national and international regulations, including the GDPR³.

The Group adopts tools designed to promote the highest standards of **protection** and confidentiality of personal data, which is always collected and processed for **specific**, legitimate purposes and with the informed consent of the interested parties.

Adopt a specific policy on the use of **digital tools**, aimed at raising awareness within the organization of the importance of properly managing and protecting data relating to company activities and those of its partners.

³ General Data Protection Regulation (EU) 2016/679.

4. IMPLEMENTATION AND MONITORING

The Group is committed to **spreading awareness** of this policy among its staff and stakeholders, ensuring its accessibility and promoting understanding at all levels.

This commitment is implemented through **internal and external communication activities** using the most suitable tools to ensure effectiveness, including digital tools, company postings, and direct sharing in procurement and commercial partnership processes.

SACMI conducts **regular internal and external audits** to monitor compliance with the company policy and has implemented specific tools (e.g. **“Whistleblowing”**) to allow the secure and confidential reporting of any violations and is uncompromising towards any form of retaliation.

This policy will be **reviewed and updated periodically** to reflect evolving human rights laws, regulations, and best practices.

5. MANAGEMENT OF NON-COMPLIANCE

SACMI Group, in line with its fundamental values of **loyalty and integrity**, adopts a **“zero tolerance” policy** towards non-compliance with the law and/or violations of fundamental rights.

In the event of non-compliance or violations being ascertained, a thorough investigation will be initiated and, if necessary, appropriate **remedial actions will be prepared and implemented**.

The discovery of a violation will result in **disciplinary measures proportionate** to the seriousness of the infraction, up to and including, in the most serious cases, termination of the employment relationship.

For SACMI suppliers and business partners who do not comply with this Policy, consequences may include formal warnings, mandatory corrective actions, up to and including **suspension or termination of business relationships**.

6. GOVERNANCE

SACMI Group is committed to fully integrating human rights issues into its corporate governance system, pursuing **continuous improvement** through increasingly precise **definitions of roles and responsibilities** and **clear, standardized procedures** to ensure compliance, effective supervision, and **the active involvement of strategic corporate functions** on relevant issues.

7. CONSISTENCY WITH THE CODE OF ETHICS AND LOCAL REGULATIONS

This Policy is integrated with SACMI Group Code of Ethics, which represents the synthesis of the principles and values shared by all individuals, entities, and functions operating within the organization. It should therefore be read and interpreted in light of these values, as well as the regulations in force in the countries where the Group operates.

In the event of a discrepancy between national regulations and international standards, the Group undertakes, at a minimum, to comply with local laws, actively working to **promote adherence to internationally recognized principles**. This approach reflects the Group's constant commitment to acting with responsibility, loyalty, and integrity, strengthening the **culture of respect and protection of human dignity in every context**.

This policy will be published on the corporate intranet (Digital Hub), periodically reviewed and updated to ensure it remains compliant with applicable antitrust and anticompetitive laws and meets the operational needs of SACMI Group.

8. CONTACTS

For any questions or clarifications regarding this policy, employees are invited to contact **sostenibilita@sacmigroup.com**.

