



Human Rights Policy
August 2025

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Leadership Message

As CEO of a multinational company operating on four continents, I would like to strongly reiterate EuroGroup Laminations' deep commitment to protecting human rights, the rights of local communities and indigenous peoples.

In an increasingly interconnected world, we believe that respect for the dignity, freedom and equality of people is not only an ethical imperative, but also an essential condition for solid, sustainable and shared business development. Operating in different territories entails a great responsibility: to observe, understand and value the cultures and rights of the communities we come into contact with every day.

Starting in January 2024, we formalised this commitment by joining the United Nations Global Compact, choosing to integrate the initiative's ten fundamental principles — including respect for human rights — into every strategy, policy and operational process at EuroGroup Laminations.

Our growth is not measured solely in economic results, but in our ability to generate value for people and the planet.

Marco Arduini - Group CEO

Glossary

In this Human Rights Policy, the following terms shall have the meanings set forth below:

Business Counterparty: An external party, whether public or private, with whom an organization has or intends to establish a business relationship (e.g., clients, joint venture partners, consultants, contractors, subcontractors, suppliers, vendors, scrap dealers, advisors, target companies in M&A operations, intermediaries, agents, distributors, representatives, investors, certification bodies, insurance companies, third parties in the context of intellectual property rights, etc.). All Business Counterparties are Third Parties, but not all Third Parties are Business Counterparties.

Company: EuroGroup Laminations S.p.A. or any of the companies directly or indirectly controlled by it.

Corruption: The offering, promising, giving, accepting, or soliciting of an undue advantage of any kind (whether financial or non-financial), directly or indirectly, and regardless of location, in violation of applicable laws, as an inducement or reward for a person to act or refrain from acting in relation to the performance of their duties.

There are various types of corruption:

- Active: when offering, promising, or giving a bribe;
- Passive: when accepting, requesting, or soliciting a bribe;
- Direct or indirect: when a bribe is offered or accepted through or by a Third Party;
- Public or private: corruption in the private, public, or non-profit sectors.

CEO: Chief Executive Officer.

CFO: Chief Financial Officer .

EGLA: EuroGroup Laminations

EuroGroup Laminations: The Group

ESG: Environmental, Social & Governance

Corporate Officers: Members of the Board of Directors, members of the Board of Statutory Auditors, and General Managers — if appointed — of the Group during their term of office, as well as any other individual in a senior position, meaning anyone who performs representation, administration, or management functions for the Company or any of its organizational units with financial and operational autonomy, as well as any person who exercises, even de facto, management and control over the Group.

Group: EuroGroup Laminations S.p.A. and all companies directly or indirectly controlled by it.

HR: Human Resources.

Human Rights: the inalienable rights of every person by virtue of their membership of the human race. These rights are based on the recognition of the dignity, freedom and equality inherent in all human beings. We consider the internationally recognised human rights set out in the International Bill of Human Rights (Universal Declaration of Human Rights and subsequent international conventions on civil and political rights and economic, social and cultural rights) and in the Declaration on Fundamental Principles and Rights at Work of the International Labour Organisation to fall within the scope of our management.

Personnel: All individuals worldwide working on behalf of EuroGroup Laminations, at all levels and grades, including Corporate Officers, directors, senior executives, officers, managers, employees (permanent, fixed-term, or temporary), interns, trainees, and Collaborators.

Policy: This Human Rights Policy

Third Parties: Individuals or entities, public or private, that are independent of the organization. Not all Third Parties are Business Counterparties, but all Business Counterparties are Third Parties.

1. Objectives and purpose of this policy

This Human Rights Policy has been drawn up in accordance with the ten principles of the *United Nations Global Compact*, an initiative that EGLA has been a part of since January 2024. The Policy is inspired by the principles of transparency, fairness, ethics and professionalism, already expressed in the Group's Code of Ethics and Anti-Corruption Code of Conduct, with the aim of strengthening EuroGroup Laminations' commitment to ensuring a working environment free from all forms of discrimination or abuse, establishing working relationships characterised by fairness, equality, non-discrimination, attention and respect for human dignity.

EuroGroup Laminations is committed to contributing to the respect of human rights, including in terms of culture and collective awareness on the issue, and to expressing its concern about any human rights issues that may arise in a country in which it operates. The Policy aims to encourage behaviour geared towards the prevention and reporting of possible violations of current legislation on the subject.

With this Policy, EuroGroup Laminations wishes to reaffirm the Group's commitment to the joint protection of human rights and the environment and to clarify the principles that inspire it, in line with the provisions of the various codes and policies already in place.

2. Scope of application

This Policy has been reviewed and approved by the Board of Directors of EuroGroup Laminations S.p.A. and its implementation and application is mandatory for the entire Group.

The Policy applies:

- to all EuroGroup Laminations personnel;
- public or private third parties who have relations with EuroGroup Laminations or who act on its behalf or to promote its commercial interests (e.g. consultants, suppliers, agents, etc.).

It is the duty of each Company to bring the Policy to the attention of third parties and to require them to comply with its provisions.

This Policy supplements the provisions of the Group's Code of Ethics and Anti-Corruption Code and establishes a single standard to which everyone must adhere.

In jurisdictions where local laws or regulations establish rules that are stricter than those set out in this Policy, those rules shall prevail.

This Policy applies to the entire Group.

3. Legal References

This Policy constitutes the basis for the protection of human rights in the Group's activities and is inspired by documents issued at various levels of jurisdiction (international, European and national) by recognised organisations.

The following are examples, but not an exhaustive list, of the international, European and national regulatory references on which the Policy is based:

- Universal Declaration of Human Rights (UN)
- UN Guiding Principles on Business and Human Rights
- The 10 Principles of the UN Global Compact
- Declaration on Fundamental Principles and Rights at Work (ILO)
- The eight Fundamental Conventions of the International Labour Organization (ILO) (No. 29, 87, 98, 100, 105, 111, 138, 182) and Convention No. 190 on the elimination of violence and harassment in the world of work
- OECD Guidelines for Multinational Enterprises
- Charter of Fundamental Rights of the European Union
- United Nations Declaration on the Rights of Indigenous Peoples
- UK Modern Slavery Act 2015

In addition to the regulations listed above, reference is made here to the principles of conduct and control measures set out in the following internal regulations:

- Group Code of Ethics
- Group Anti-Corruption Code of Conduct
- Group Supplier Code of Conduct
- Group Diversity, Equity and Inclusion Policy
- Group Sustainability Policy
- Group Environment, Health and Safety Policy
- Group Information Security Policy
- Organisational, Management and Control Model pursuant to Legislative Decree No. 231 of 8 June 2001 of EuroGroup Laminations S.p.A. and its Italian subsidiaries.

4. Key Principles

EGLA is aware of the importance of respecting fundamental human rights throughout the value chain, both in its internal activities and in those outsourced.

In particular, the Group is committed to respecting and promoting the following principles:

- Rejection of forced or compulsory labour and child labour

The Group rejects the use of any type of forced or compulsory labour and all forms of slavery and human trafficking. Furthermore, EGLA does not confiscate money or identity documents for the purpose of retaining workers against their will.

Particular attention is paid to the protection of minors and respect for their rights throughout the value chain.

EGLA rejects labour exploitation in all its forms, including the use of child labour that does not comply with the legislation in force in the country where the activities are carried out. The Group undertakes to respect the minimum age for access to work, which cannot be lower than the age required for completion of compulsory schooling and, in any case, cannot be lower than 15 years. Minors and adolescents under the age of 18 may not be employed in hazardous work.

These principles are also expressed in the Group's Code of Ethics.

- Respect for diversity and non-discriminations

As expressed in its Diversity, Equity and Inclusion Policy, the Company promotes the principles of diversity, inclusion, equity and equal opportunities, guaranteeing the right to working conditions that respect the dignity of every person, together with the creation of a fair and inclusive working environment.

EGLA is committed to protecting the physical and psychological integrity and individuality of each person. It opposes any form of behaviour that causes discrimination based on gender, age, disability, nationality, sexual orientation, ethnicity, religion, political opinions and any other form of individual diversity or that is harmful to the person, their beliefs or preferences. Equal effort is made to ensure freedom of expression.

Physical, verbal, visual, psychological, discriminatory or sexual harassment is not tolerated in any way.

- Freedom of association and collective bargaining

As also described in the Code of Ethics, the Group guarantees the right of employees to form or join organisations aimed at defending and promoting their interests and respects the right of employees to be represented by trade unions or other forms of representation elected in accordance with the laws and practices in force in the various countries in which EGLA operates. The Group promotes collective bargaining, where applicable, as a means of defining contractual working conditions.

- Health, safety and well-being

The Group considers the protection of the health and safety of its personnel and third parties who work within the company's facilities for any reason to be a matter of fundamental importance. As also established by the Policy on Environment, Health and Safety in the Workplace, EGLA is committed to ensuring compliance with relevant regulations and promoting good practices throughout the company, in order to ensure a working environment that is free from health and safety risks.

To this end, EGLA is committed to providing mandatory training courses aimed at raising awareness among personnel, both on specific risks related to production activities and on general safety aspects concerning daily work tasks.

Finally, these issues are also addressed through the involvement of third parties with the aim of promoting awareness of health and safety protection throughout the entire supply chain.

- Fair and favourable working conditions

EGLA ensures fair working conditions for its staff and requires that the same rights be respected by all third parties throughout the entire value chain. Fair working conditions mean respect for the health, safety, well-being and dignity of employees, together with the monitoring and verification of maximum working hours, the enjoyment of daily and weekly rest periods, and the use of paid annual leave.

In addition, the Group ensures that the remuneration of its employees takes into account the principle of fair compensation for work and equal pay for male and female workers. The minimum remuneration of Group employees cannot be lower than that established by collective agreements and current legislation in the various countries, in accordance with both international standards and the Group's Code of Ethics.

- Environmental Protections

EuroGroup Laminations, given its core business and its role as a catalyst for energy transition, is committed to protecting natural resources and combating climate change. As already extensively discussed in the Sustainability Policy, over the years the Group has equipped itself with increasingly innovative technologies and production processes capable of ensuring maximum efficiency of its electric motors in a wide range of applications. In addition, more than 35% of the Group's companies have obtained ISO 14001 certification in order to ensure full compliance with international standards for the management of environmental issues within the company. The Group is committed to minimising its environmental impact in all areas of operation by reducing its carbon emissions, purchasing part of its energy requirements from renewable energy sources and using sustainable materials. Finally, staff and third parties are encouraged to adopt environmentally friendly and energy-saving practices in their daily activities.

- Respect for the rights of local communities and indigenous peoples

EGLA is committed to respecting and promoting the rights of the local communities in which it operates, adopting an approach based on transparent dialogue. The Group recognises and protects the rights of local populations by acknowledging the value of their cultures, identities and traditions. EuroGroup Laminations guarantees equal access to employment and training opportunities, without discrimination, and values traditional knowledge in its projects. Every action is guided by the principles of sustainability, fairness and transparency, with the aim of contributing to the creation of lasting and respectful relationships with indigenous peoples. In doing so, the Group integrates social responsibility and human rights into its corporate strategy, which is based on the dignity of every human being and the responsibility of the company to contribute to the well-being of people in the countries in which it operates.

- Fighting corruption

The Group adopts a zero-tolerance approach towards all forms of corruption, whether active or passive, direct or indirect, by anyone, whether for the benefit of the Group or to its detriment. The Anti-Corruption Code of Conduct sets out clear rules of conduct for staff and third parties, promoting ethical behaviour that complies with local and international regulations. Sensitive areas are identified, such as relations with public officials, human resources management, gifts and sponsorships. Every transaction must be traceable, documented and correctly recorded. Continuous training and awareness-raising among Personnel are key elements of the prevention system. Compliance with the Anti-Corruption Code of Conduct is mandatory and violations will result in disciplinary sanctions.

- Privacy

EGLA respects the confidentiality and right to privacy of its staff and third parties and undertakes to use the data and information provided to it correctly.

The Group processes personal data in compliance with all fundamental rights, observing the freedoms and principles recognised by law, in particular respect for private and family life, home and communications, the protection of personal data, freedom of thought, conscience and religion, freedom of expression and information.

EGLA has adopted an Information Security Policy, which is based on international standards and defines how personal data is processed and stored.

5. Implementation and Monitoring

EGLA verifies the adoption of the Policy, undertaking to analyse potential risks within the Group and to define mitigation and remedial actions to be implemented in the event of such risks occurring, strengthening its Internal Control and Risk Management System. The Group guarantees a system for reporting violations and dialogue with stakeholders.

Staff are responsible for monitoring the correct application of the principles expressed in the Policy and are required to behave impartially and respectfully in accordance with company laws, procedures and regulations and to carry out all activities on behalf of the Group with the utmost honesty, cooperation, moral integrity and professional diligence.

6. Roles and responsibilities

- The Company's Board of Directors is the body responsible for adopting and supervising compliance with this Policy;
- The heads of the departments and units that manage EuroGroup Laminations' operational and support processes, including Human Resources and Purchasing, are responsible for the internal control and risk management process, actively participating in its proper functioning throughout the value chain;
- The ESG Department is responsible for monitoring and reporting on the Group's environmental and social impacts, which also consider respect for human rights, both internally and among commercial counterparties;
- The Internal Audit Department, as a third-level control function, verifies the operation and suitability of the Internal Control and Risk Management System, which includes analysing the adequacy of control measures aimed at preventing and mitigating risks related to violations of human rights legislation.
- The Ethics Committee, which at EGLA coincides with the 231 Supervisory Body, manages internal and external reports of alleged irregularities.

7. Reporting Violations

Any suspected or known violation of this Policy or of the human rights regulations in force in the countries where the Group operates must be immediately reported through the appropriate dedicated channels, as set out in the applicable Whistleblowing Procedure.

EuroGroup Laminations encourages and allows all Personnel to report attempted, suspected and actual cases of violation, ensuring that the person who made the report is not dismissed, demoted, suspended, threatened, harassed or discriminated against in any way in the workplace for having made a report legitimately and in good faith.

8. Disciplinary Sanctions

Employees and third parties, within the scope of their relationship with EuroGroup Laminations, are required to comply with this Policy and the regulatory provisions in the field of Human Rights.

In the event of a violation committed by an employee, the adoption of appropriate disciplinary measures in line with the applicable National Collective Labour Agreement will be considered.

In the event of a violation committed by third parties, within the scope of their relationship with EuroGroup Laminations, the adoption of appropriate measures will be considered on the basis of the existing contract until its termination and any claim for damages.

9. Policy review and updates

The above Policy will be reviewed by the ESG Function on the basis of proposals from the Risk Control and ESG Committee to ensure its effectiveness over time and compliance with emerging best practices.

Any substantial revision will be subject to approval by the Board of Directors of EuroGroup Laminations S.p.A.