



POLICY ON HUMAN RIGHTS

Publication date 09/12/2024

Version No. 1

Contents

1. INTRODUCTION 3

2. BACKGROUND OF REFERENCE 3

2.1 REGULATORY REFERENCES 3

2.2 SCOPE OF APPLICATION 3

3. PRINCIPLES 4

3.1 HUMAN RESOURCES 4

3.2 BUSINESS PARTNERS AND SUPPLIERS 5

3.3 COMMUNITY 5

4. IMPLEMENTATION, CONTROL AND MONITORING 6

4.1 STAKEHOLDER ENGAGEMENT 6

4.2 REPORTING BREACHES 6

4.3 DISCIPLINARY SYSTEM 6

5. ROLES AND RESPONSIBILITIES 7

5.1 APPROVAL AND REVIEW 7

5.2 DISSEMINATION 7

6. GLOSSARY 8



1. INTRODUCTION

The METLAC Group, as established in its Organisation, Management and Control Model, pursuant to Italian Legislative Decree no. 231/2001, and as laid out in the Strategy and Action Plan for Sustainable Development, expects the utmost respect for people and the applicable labour regulations and utterly condemns irregular, forced or compulsory labour as well as child and under-age labour. One of the Group's objectives is to create an employment relationship in which respect for the individual, their dignity and values are held in express and constant consideration, with the avoidance of any discrimination. Respect for Human Rights is deeply rooted in the METLAC Group's values and founding principles.

2. BACKGROUND OF REFERENCE

The METLAC Group and its subsidiaries, both domestically and overseas, undertake to respect, safeguard and promote Human Rights when carrying out their business activities. In this regard, this Policy document lays out the principles and rules of conduct expected from METLAC Group employees and collaborators in relation to Human Rights.

The METLAC Group aims to avoid, in carrying out its activities, any behaviour, act or decision that might cause, or contribute to causing, a negative impact on Human Rights and the Group promotes respect for such Rights in dealings with employees, contractors, business partners and suppliers. The company wishes all Stakeholders, that is, anyone who has dealings with the organisation, to adhere to the principles of this Policy by paying particular attention to the situations or circumstances that present the greatest risks to Human Rights.

2.1 REGULATORY REFERENCES

This Policy is applicable, along with all the regulations in effect, in the countries in which METLAC Group companies operate, and in addition to all the principles laid out in the Code of Ethics, in the Code of Conduct, in the Whistleblowing Policy, relating to the Organisation, Management and Control Model, pursuant to Italian Legislative Decree no. 231/2001, and in all current company policies and procedures.

The document has been prepared on the basis of international standards such as: the Universal Declaration of Human Rights and the fundamental Conventions of the International Labour Organization (ILO), the ILO Declaration on Fundamental Principles and Rights at Work and its follow-up, the United Nations' Convention on the Rights of the Child, the European Convention on Human Rights and the United Nations' Guiding Principles on Business and Human Rights.

2.2 SCOPE OF APPLICATION

Every party who interacts with the METLAC Group, regardless of their role and their scope of collaboration and the duration of the relationship, is required to observe and apply this Policy, and to respect the Human Rights of every individual, avoiding any form of discrimination.

The METLAC Group undertakes not to cooperate with partners who fail to share these principles and to ensure that any relationship undertaken is in line with the full respect for Human Rights.

3. PRINCIPLES

3.1 HUMAN RESOURCES

The METLAC Group condemns every form of discrimination and the use of coercion, deception and lack of transparency in the selection and recruitment process. It undertakes to ensure a work environment that safeguards the dignity and rights of employees as individuals, not to request, at any stage of the selection and recruitment process, contributions of any kind and not to keep personal identification documents of employees, such as identity documents, for the purpose of withholding the latter against their will.

The METLAC Group requires the utmost respect for people and for the applicable labour regulations and utterly condemns trafficking in human beings as well as irregular, child, forced and compulsory labour. The Group undertakes to comply with the specific ILO Conventions, or, where more stringent, the labour regulations applicable in any of the countries in which the companies belonging to the Group operate. The METLAC Group also undertakes to ensure that all employees and collaborators under the age of 18 operate in roles appropriate to their age, as defined by ILO Convention no. 182.

The health, safety and well-being of employees are extremely important to the METLAC Group, which undertakes to maintain a safe work environment, free of any form of violence, harassment or intimidation, promoting high standards of protection for the health and safety of workers and reducing exposure to risks. The METLAC Group also undertakes to ensure that all operating offices comply with the legislation of the country in which they are located in terms of health and safety and, in any case, that they comply with standards in line with international regulations and best practices. The company promotes the dissemination of a culture of safety at work by encouraging employees and collaborators to behave responsibly, including through training and information initiatives, collaborating with employees through an involvement process aimed at improving health and safety conditions in the workplace, proceeding to, among other things, the identification of hazards and the resolution of problems related to health and safety and the adoption of all necessary precautionary measures.

The METLAC Group recognises people as the Group's most important resource engaged in the pursuit of the Group's goals and undertakes to ensure - at every stage of the employment relationship, from the selection process to the assignment of roles, from professional growth to the conclusion of the relationship - equal opportunities, avoiding any form of discrimination in employment or position and promoting a culture in which people recognise the value that a diverse and inclusive workforce entails. No form of discrimination whatsoever shall be tolerated on the

basis of ethnicity, skin colour, gender, sexual orientation, religion, nationality, age, disability, political opinion, trade union membership, marital status, health status or any other social status or personal characteristic.

The METLAC Group operates in full compliance with local laws and international industry standards with regard to working hours, wage conditions being higher than the subsistence level, insurance and social security conditions, overtime work and employee benefits. Working hours are established in accordance with local legislation and in full compliance with the relevant ILO Conventions and with particular regard, where applicable, to the regulations provided for by national collective bargaining agreements and their supplements. Employees and collaborators shall have at least one day off a week and shall have paid vacation, leave and sickness.

The METLAC Group guarantees all its employees, without distinction, the right to form associations and freely join organisations without the need for prior authorisation.

The organisation undertakes to respect the privacy of its employees, refraining from disclosing data or personal information to third parties, except to the extent and for the purposes permitted by applicable legislation, committing to the correct use of the data and information provided, in accordance with current applicable regulations.

3.2 BUSINESS PARTNERS AND SUPPLIERS

The METLAC Group considers it essential that its business partners and suppliers adhere to the highest ethical standards and respect for Human Rights. The company undertakes not to establish, maintain or develop business relationships with suppliers or partners that employ forms of irregular, compulsory, forced or child labour; that do not guarantee safe, healthy working conditions and respect for the dignity of workers; that discriminate on the basis of gender, age, race, ethnic origin, religion, political orientation, disability or any other personal characteristics; or that do not respect local and international regulations on labour, safety and Human Rights.

3.3 COMMUNITY

The METLAC Group, as part of its Policy on Human Rights, recognises the fundamental role that local communities play in the success of its activities and undertakes to operate in a responsible, inclusive manner to promote respect for, the safeguarding of and the improvement in Human Rights in the areas in which it operates.

The organisation undertakes to collaborate with the territory and to maintain an open, constructive dialogue with local communities and Stakeholders. The aim is to support initiatives that promote inclusion, equity and the improvement of living conditions, paying particular

attention to vulnerable and disadvantaged groups, ensuring respect for their fundamental Human Rights. Through this approach, the METLAC Group reaffirms its commitment to promoting Human Rights as an integral part of its contribution to the sustainable development of the communities in which it operates.

4. IMPLEMENTATION, CONTROL AND MONITORING

4.1 STAKEHOLDER ENGAGEMENT

This Policy on Human Rights document is brought to the awareness of all internal and external Stakeholders through appropriate communication tools, such as the institutional website, the intranet platform within the QHSE&S portal to which all operating personnel have free access, periodic information and training sessions open to all internal staff and external Stakeholders. The METLAC Group also reports annually on the activities carried out in the context of promoting Human Rights in its Sustainability Report, to inform and raise awareness among its Stakeholders and to communicate the relative results obtained.

This Policy applies to the METLAC Group and its subsidiaries. It is specifically addressed to the members of the Board of Directors and other Corporate Bodies, to employees, collaborators, consultants (including any commercial intermediaries), suppliers (including subcontractors) and business partners of the company with whom relationships or business arrangements are established or who, for any reason and regardless of the type of contractual relationship, operate in the name or on behalf of the organisation.

4.2 REPORTING BREACHES

All recipients are required to report alleged or actual breaches of human rights that come to their attention in the course of their work, as well as any other breach or suspected breach of this Policy.

To this end, dedicated communication channels have been established, as defined in the Code of Ethics and the Whistleblowing Policy. Reports received will be assessed and handled with the utmost confidentiality, safeguarding the whistleblower from any form of retaliation, discrimination or penalty, without prejudice to legal obligations and safeguarding the rights of the company or of parties accused erroneously and/or in bad faith.

4.3 DISCIPLINARY SYSTEM

The METLAC Group undertakes to identify, assess, prevent and mitigate the risks of a breach of Human Rights promptly by implementing appropriate remedial actions, if such events occur.

Compliance with this Policy is an integral part of the contractual obligations of employees, collaborators and all Stakeholders. Any breach will, therefore, result in measures being applied, as provided for by applicable legislation and national collective bargaining agreements. Should an external party fail to comply with the Policy, this may result in the termination of the contract, the assignment or, in general, the existing relationship with the company as well as, should the conditions exist, in the company seeking compensation for damages.

5. ROLES AND RESPONSIBILITIES

5.1 APPROVAL AND REVIEW

This Policy document was prepared by HR in November 2024 in collaboration with HSE&S. This version has been approved by the METLAC Group's Board of Directors. The structure of the document complies with the requirements of European standards (the CSRD). This document may be revised or amended in the event of a change or update to the Strategic Plans, as a result of mandatory regulatory aspects or organisational needs. Any new documents, in order to be considered valid, shall be submitted to and approved by the Board of Directors. Therefore, this Policy will be subject to periodic review in order to ensure its adequacy and the effectiveness of its implementation.

The METLAC Group, therefore, undertakes to monitor any development, both internal and external, in every country in which it operates, which might affect the Policy, constantly evaluating its performance and implementing the necessary actions with a view to continuous improvement.

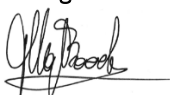
Where local law or customs impose higher standards than those laid out in this Policy, such local laws and customs shall always apply. If, on the other hand, the Policy provides for a more restrictive standard then it shall prevail.

5.2 DISSEMINATION

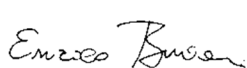
This Policy is made available to all Stakeholders and can be accessed via the company's website at: <https://www.metlac.com/sostenibilita/>

The METLAC Group promotes the adoption of this Policy by all the companies belonging to the Group.

CEO
Pier Ugo Bocchio



General Manager Italy
Enrico Buriani



CRO
Guido Chiogna



6. GLOSSARY

Best practices: The set of activities, procedures, behaviour, habits, which, when organised in a systematic way, can be taken as a reference and reproduced to promote the achievement of the best corporate results (page 3).

ILO Convention 182: Worst Forms of Child Labour Convention, 1999, concerning the prohibition of the worst forms of child labour (page 3).

CSRD. The *Corporate Sustainability Reporting Directive* is the new European Commission Directive. Its objective is to establish a new framework for non-financial reporting by companies on their environmental, social and governance impacts (page 6).

Italian Legislative Decree no. 231/2001 or MOG 231: Organisation and Management Model pursuant to Italian Legislative Decree no. 231/01. Pursuant to Italian law, it can be adopted by a legal person, or an association without legal personality, and is aimed at preventing the criminal liability of entities (page 2).

Guiding Principles on Business and Human Rights: the United Nations' Guiding Principles on Business and Human Rights is a tool composed of 31 principles that implement the United Nations' (UN) "Protect, Respect and Remedy" framework on the issue of Human Rights and Transnational Corporations and other Business Enterprises (page 2).

HR: the *Human Resources* function of the METLAC Group, which exercises its function at the parent company, METLAC SPA (page 4).

HSE&S: the *Health, Safety, the Environment and Sustainability* function at METLAC SPA (page 4).

Irregular work (or "undeclared work"): this is work which is carried out, in whole or in part, without any contractual or tax regularisation (and, therefore, without pension, social security and insurance considerations) or in breach of the law since it provides for, for example, working hours that do not comply with the legislation (pages 2-3).

Privacy: indicates the private sphere of each individual and, in particular, that set of personal and potentially sensitive information on which one might wish to maintain confidentiality, excluding public access.

QHSE&S: *Quality, Health, Safety, the Environment & Sustainability*; the "QHSE&S portal" means the METLAC Group's intranet storage space used for managing documentation relating to Quality, Health, Safety, the Environment & Sustainability practices (page 4).

Stakeholder: any individual, group or organisation that has an interest in or is affected, directly or indirectly, by a company's activities, decisions or results (pages 2-4-5).

Whistleblowing: these are reports made by a worker who, in carrying out their duties, notices a situation, a fact or circumstances which, reasonably, could lead one to conclude that an irregular or an unlawful act has occurred (page 2).