

RESPECT FOR HUMAN RIGHTS

FERALPI GROUP POLICY

Introduction

The Feralpi Group has decided to adopt principles to safeguard human rights in accordance with the *UN Universal Declaration on Human Rights & Guiding Principles on Business and Human Rights*, the *ILO Declaration on Fundamental Principles and Rights at Work*, and the *ten principles of the Global Compact framework*, and is committed to ensuring that they are implemented and promoted in day-to-day operations within the value chain.

The Group considers human rights as fundamental freedoms for all human beings, without exception. To ensure respect for these rights, Feralpi is committed to always complying with legislation in the countries in which it operates, and to defining respectful rules of conduct that are consistent with the guidelines where applicable. The Group also uses its own internal management systems and standards as a reference, such as the Code of Ethics, Governance Model, the quality, environmental and management system, the company's privacy policy, and the management system of external companies.

Furthermore, the Group aligns its operations with national and international organisations working to promote human rights, such as the *Charter for Equal Opportunities and Equality at Work* promoted by Fondazione Sodalitas and Confindustria Brescia, the *CEO Call to Action on Human Rights* promoted by the WBSDC through the CSR Manager Network, the *UN 2030 Agenda*, specifically Goal 8: Decent Work and Economic Growth, and by supporting *Wirtschaft Für Ein Weltoffenes Sachsen*, promoted by the Ministry of Economy, Work and Traffic in Saxony.

Scope of the Group's vision and policy

People are at the centre of the Feralpi group's business model, as an essential element for the development, growth and existence of the company, both currently and in the future. Respecting and safeguarding human rights must come first and foremost.

This policy aims to provide a reference for safeguarding human rights in all Feralpi Group operations, by providing useful guidelines on preventing risk, planning mitigation actions where required, and defining maintenance actions.

Commitments

Feralpi's commitment concerns all human rights without exception, and considers the background, social and business context in which the Group's companies operate. This means focusing on three areas:

1. *Human rights in the workplace*: Feralpi will not tolerate discrimination, and guarantees equal treatment regardless of age, gender, ethnicity, mental or physical ability, sexual orientation, religious beliefs or criminal record. The company works to provide safe, healthy work conditions, even for operators working in high-risk environments, and protects rights to freedom of association, collective bargaining and equal pay. No type of forced or juvenile labour is permitted, nor any form of punishment, harassment, psychological, physical or verbal intimidation, under any circumstances.

2. *Human rights in the value chain*: Feralpi contributes to creating safe, healthy work conditions for suppliers, especially in high-risk cases, such as suppliers working as contractors or subcontractors. Suppliers are required to be familiar with the Group's commitment to human rights, and to recognise the Code of Ethics and commitment to observing the relevant values and principles, ensuring their employees and collaborators are aware of its existence. In the same way, Feralpi cooperates with its customers in protecting human rights and combating all forms of violation along the supply chain.

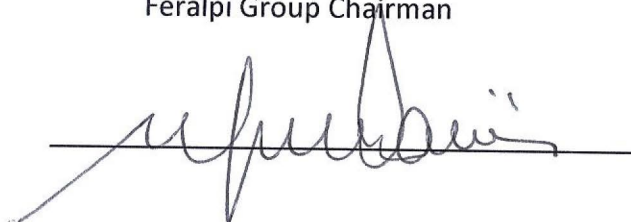
3. *Human rights in local communities*: Feralpi is aware of the impact its business operations may have in local communities and the surrounding territory. The Group is therefore committed to engaging with communities to prevent any risk related to breaching their human rights.

Finally, the Feralpi Group is committed to preventing any breach of human rights relating to the company, and to supporting anyone working to defend the human rights of everyone.

This policy was produced for the Feralpi Group in its entirety, and any organisations or individuals that have a relationship with the Group.

Lonato del Garda, 01 July 2021

Feralpi Group Chairman

A handwritten signature in black ink, written over a horizontal line. The signature is stylized and appears to be 'M. Ferialpi'.