

HUMAN RIGHTS POLICY

APPROVED BY THE CHIEF EXECUTIVE OFFICER OF THE MAIRE GROUP
ON 16 DECEMBER 2025



1 SCOPE

The purpose of this Policy is to define MAIRE's commitment to respect, protect and promote human rights in all Group companies, towards its staff and the local communities in which it operates, and to promote respect for them along its supply chain, recognizing the central role of the individual.

The Policy incorporates the principles and values of the Code of Ethics, the Sustainability Policy and the Policies adopted by the MAIRE Group, which define its identity and culture, as detailed in the references section of the document.

1.1 Applicability and dissemination

This Policy applies to MAIRE and to all Group companies that are committed to promoting its principles to all stakeholders in upstream and downstream activities, along the value chain.

All employees, interns, collaborators, temporary workers and those who work for a company of the MAIRE group and operate in the name and on behalf of the same, are required to strictly observe its principles and to actively apply them in all interactions with colleagues, customers, suppliers, partners, local communities and any other individual or entity involved in their work activities.

This Policy is communicated to all the people who work for the Group, including through dedicated training opportunities, and is made available on the MAIRE corporate website to all stakeholders so that there is full awareness and even greater impetus for its promotion.

1.2 Approval and Review

The Human Rights Policy is approved by the Chief Executive Officer of the MAIRE Group.

The document is revised whenever regulatory updates, strategic developments or contextual changes require or recommend revisions, involving the competent corporate functions.

1.3 Governance

MAIRE is committed to actively orienting its corporate "*purpose*" towards the integration of sustainability and *stakeholder* expectations within its business model, acting on both internal and external dimensions of the company.

MAIRE's *corporate governance* system is structured to ensure an effective and transparent management and control model, oriented towards sustainable success. In line with international best practices and the principles and recommendations of the Corporate Governance Code of Borsa Italiana S.p.A. to which MAIRE adheres (the "**Code**"), the Company's approach to sustainability is integrated into the corporate strategy, with the aim of generating long-term value for the benefit of shareholders, taking into account the interests of relevant *stakeholders*.

MAIRE's sustainability governance is based on a system of roles, responsibilities and decision-making processes that ensures the oversight of environmental, social and *governance issues* within the organisational structure. This system promotes the effective integration of sustainability factors into strategic decisions and in the Company's operational and management management, contributing to the creation of shared value and the mitigation of risks related to the environmental and social impacts of the Group's activities.

MAIRE adopts a structured approach to sustainability management, which involves the Board of Directors, the Control, Risk and Sustainability Committee, management and operational functions, ensuring effective oversight of sustainability issues and, thanks to the Functions in charge, constant monitoring of sustainability performance, in line with the strategic objectives and commitments undertaken by the Group.

In particular, it is the responsibility of the Board of Directors to define and approve, on an annual basis and with the support of the Control, Risk and Sustainability Committee, the so-called "Double Materiality Matrix"

for the identification of the impacts, risks and opportunities to be placed at the basis of the Group's long-term sustainability strategies and, consequently, of the MAIRE Group's Sustainability Reporting.

In addition to the above, the Board of Directors monitors the progress of the results with respect to the sustainability objectives, ensuring alignment with the industrial strategy and reference scenarios. In addition, with the support of the Control, Risk and Sustainability Committee, it annually updates the MAIRE Group's Sustainability Plan, defining the Group's strategic objectives in relation to significant sustainability issues in the medium and long term. These objectives are integrated with the Group's long-term industrial strategies, which are also updated annually by the MAIRE Board of Directors, which, to this end, takes into account, among other things, the evolution of the geopolitical context, the markets and *the business sectors* in which the Group operates, at a global level.

The proposals for the Board of Directors and the Control, Risk and Sustainability Committee relating to the so-called "Double Materiality Matrix" and the related strategies are defined with the support of MAIRE's Group Sustainability & Corporate Advocacy Function on the basis of the so-called "*stakeholder engagement*" activities carried out annually by the latter with the involvement of both *stakeholders* internal and external. The same Function is also assigned the task of planning and monitoring the Group's sustainability initiatives. This Function operates in close coordination with MAIRE's Sustainability Reporting, Performance and Disclosure Function, which is responsible for preparing, with the support of the Group Sustainability and Corporate Awareness Function, the Group's Sustainability Reporting.

The Board of Directors also periodically supervises, with the support of the Control, Risk and Sustainability Committee and the Functions in charge: i) the status of implementation of the strategic sustainability initiatives defined for the Group, on the basis of the so-called "Double Materiality Matrix" approved, and ii) any updates made to the assessments relating to risks and opportunities.

MAIRE is also equipped with an internal control and risk management system intended as the set of rules, procedures and organizational structures aimed at effective and effective identification, measurement, management and monitoring of the main risks, in order to contribute to the sustainable success of the Company defined in line with the Company's strategies, including those of sustainability, whose adequacy and effectiveness are verified every six months.

In addition to the Board of Directors and the Control, Risk and Sustainability Committee, the subjects of the internal control system described above also include - among others - the Board of Statutory Auditors, the Chief Executive Officer (in his capacity as *Chief Executive Officer* of MAIRE), the Manager responsible for preparing the company's financial reports and MAIRE's Group Risk Management, In Country Value and Special Initiatives Function; this Function which, *inter alia*, has the role of supporting in the process of identifying impacts, risks and opportunities relevant to the updating of the MAIRE Group's Sustainability Plan.

The Company, in defining its *governance system*, has also established:

- an Internal Sustainability Committee, a strategic advisory body at the service of MAIRE's Chief Executive Officer, with the task of providing support in the definition of policies and strategies aimed at the sustainable management of the *business*, development programmes, guidelines and objectives, including in terms of *Corporate Giving*, monitoring their achievement, as well as analysing the dynamics of interaction with stakeholders.
- an Internal Committee to oversee the Internal Control and Risk Management System, with advisory functions, in which the main corporate functions part of the System participates, at the service of the *Chief Executive Officer* of MAIRE, with the task of supporting the corporate functions involved in the internal control and risk management system (including those related to sustainability issues).

2 COMMITMENT

The MAIRE Group is committed to respecting the dignity of individuals and fundamental human rights. It rejects and condemns all forms of intolerance, violence, harassment and discrimination. The Group requires its stakeholders to conduct themselves in accordance with the aforementioned principles. The Group is committed to promoting the best business practices and a safe, fair working environment that complies with national and international regulations. MAIRE's commitment is aimed at guaranteeing equal opportunities, safety at work and enhancement of human capital and ensuring treatment based on dignity and respect for all workers who work for the Group.

In this regard, MAIRE is committed to ensuring the highest standards through the adoption of advanced processes and methodologies, as well as the implementation of training and continuous improvement programs.

3 OBJECTIVES AND STRATEGIES

The MAIRE Group is aware of its responsibility to respect and promote human rights in its activities, in line with the ethical principles to which the Group adheres, its Sustainability strategy and social sustainability commitments.

In order to ensure the effective implementation of respect for human rights, the Group aligns itself with and endorses the commitments of the United Nations, its Agencies and other international organizations for the protection and defense of human rights. MAIRE incorporates the principles expressed by the main international frameworks, including the International Bill of Human Rights, the Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. In addition, adherence to the United Nations Global Compact further confirms and strengthens the Group's commitment to promoting respect for human rights and best labor practices.

This MAIRE Policy establishes zero tolerance towards all forms of human rights violations, including forced or child labour, modern slavery, discrimination, harassment and unsafe working conditions, committing to prevent them and promoting respectful and decent working conditions, in line with the main international standards.

With reference to the management of ethical and social aspects and respect for human rights, the SA8000 system of the multi-site perimeter represents a tool adopted by the Group to assess, mitigate and control the risks associated with its own workforce and that of the *supply chain*. This system focuses on the requirements of the SA8000 standard such as child labour, forced or compulsory labour, freedom of association and the right to collective bargaining, discrimination, disciplinary practices, working hours, pay, as well as the health and safety of employees. It also provides for reporting and control mechanisms to ensure compliance with the aforementioned standard.

The Group promotes compliance with this Human Rights Policy towards personnel and stakeholders along the *Group's supply chain*, both in its daily work and in a strategic perspective.

The Group recognises its active role in the territories in which it operates and is committed to building solid, transparent and inclusive relationships with local communities. With a view to social responsibility and sustainability, MAIRE promotes initiatives aimed at generating shared value.

Own workforce

The Group considers employees to be an essential strategic resource and is committed to ensuring that their rights are respected and that dignity, freedom and diversity in the workplace are safeguarded. Therefore, the following guiding principles regarding human rights constitute the fundamental values pursued by the Group in each activity.

The Group is also committed to continuing to invest in training and internal communication to raise awareness and involve the entire corporate community with respect to these issues, human rights and the risks of

violation. All employees are involved in an intensive and constant training program to improve knowledge of the SA8000 system, also providing activities dedicated to new hires and periodic updates. The following principles inspire MAIRE's strategic actions for the protection of workers' rights and the promotion of ethical practices in activities at a global level:

- **Rights and well-being:** MAIRE has always considered its workforce a central and strategic resource and is committed to ensuring respect for human rights throughout the duration of the employment relationship. People's rights are considered essential for the creation of sustainable value, and find concrete expression in company policies, management systems and training programs.
- **Respect for the individual, inclusion and enhancement of diversity:** the Group believes that each Person makes, with their individuality and experience, a fundamental contribution to the development and growth strategy of the company. The Group recognises and promotes the richness and value of diversity as an effective organisational, motivational and competitive lever. People represent the main asset that the Group is committed to researching, attracting, retaining and engaging, respecting them and enhancing their uniqueness, freedom, dignity, skills, attitudes, knowledge, potential and guaranteeing equal opportunities. The Group promotes coexistence and the integration of diversity, fostering and preserving an open and stimulating work environment based on trust and transparency. It creates conditions for each individual to access the working environment and express themselves freely. The Group does not tolerate any form of discrimination based on gender, culture, nationality, age, political opinions, religion, sexual and emotional orientation, cognitive, physical and socioeconomic differences and condemns any form of violence, harassment and abuse.
- **Freedom of association and collective bargaining:** MAIRE, in accordance with local laws, recognizes and *respects the right of workers to associate freely, join trade unions, have representatives, join workers' works councils and participate in collective bargaining.*
- **Occupational health and safety:** MAIRE believes that the promotion of health, safety and physical and mental well-being is a pillar principle of corporate identity. The Group applies rigorous standards in line with the ISO 45001 standard and invests in advanced prevention, training and safety culture programs, both in its offices and on construction sites. This is made possible by the adoption of a HSE and SA8000 multi-site management system, which makes it possible to continuously monitor safety performance, act promptly on risks and promote widespread awareness among all the actors involved.
- **Fair and favourable working conditions:** MAIRE is committed to ensuring decent working conditions, with fair pay, fair hours and respect for the right to rest. The Group promotes a structured welfare system to support the needs of employees and improve their quality of life, also strengthening access to training and professional development. Employees benefit from remuneration policies based on merit, internal fairness and incentive mechanisms also linked to ESG objectives.

Workers in the supply chain

The Group recognises its responsibility to promote respect for human rights throughout the supply chain, aware that sustainable business conduct is based on respect for the dignity, safety and fair treatment of all workers. MAIRE has adopted a Supplier Code of Conduct with the aim of disseminating the Group's values and its commitment to ESG throughout the supply chain. Therefore, MAIRE requires its Suppliers to share and respect its principles and values, as well as to commit to collaborating with the Group to achieve a responsible and sustainable supply chain, built on lasting relationships based on integrity, transparency and respect.

The following principles outline MAIRE's strategic actions to protect workers' rights in the supply chain and promote ethical practices in its operations globally:

- **Respect for human rights along the supply chain:** MAIRE recognises its responsibility to ensure that all workers involved in the Group's activities are treated with dignity and respect and to promote and monitor that workers employed by suppliers and subcontractors are treated in the same way. The Group adopts an approach based on respect for human rights and social responsibility throughout

the supply chain, requiring suppliers and subcontractors to ensure that working conditions are fair, safe and comply with international standards.

- **Rejection of forced labour and child labour:** MAIRE establishes a principle of zero tolerance towards any form of forced or child labour. This commitment is formalized through the adoption of the SA8000 standard and confirmed by the provision of internal audits and social audits along the supply chain. All collaborators and suppliers must comply with international and local regulations on the subject.
- **Rejection of modern slavery:** The Group also repudiates any form of so-called modern slavery, as a crime and violation of fundamental human rights, in the possible forms of slavery, servitude, forced and compulsory labor and also understood as human trafficking. Such situations are characterised by the deprivation of liberty of one person by another in order to exploit him for personal or commercial purposes. The MAIRE Group has a zero-tolerance approach to modern slavery as defined above and is committed to acting ethically and integrally in all business relationships involving it.
- **Health and safety in the supply chain:** MAIRE ensures that health and safety principles also extend to workers on construction sites and in suppliers' manufacturing workshops. As for indirect workers, extensive HSE training is carried out and performance is constantly monitored. The HSE & SA8000 management system, adopted at Group level, in the multi-site perimeter, promotes safe working conditions also for suppliers and subcontractors and provides for internal and third-party audits to verify its effective application.
- **Prevention of violations and social auditing:** MAIRE, through social audit campaigns, has intensified control activities on the supply chain. Suppliers are also selected on the basis of an ESG and social risk questionnaire of the countries in which they operate, identified with tools such as Worldwide Governance Indicators. Any non-conformities detected are addressed with corrective and preventive action plans, signed with the suppliers involved.
- **Training in the supply chain:** MAIRE promotes training activities aimed at the supply chain, with the aim of strengthening awareness of the risks for workers and disseminating responsible prevention and mitigation practices, thus contributing to a shared culture of respect for human rights throughout the supply chain.

Local communities

MAIRE's direct and indirect operational activities represent a tool through which the Group is committed to generating value at local and global level. In order for communities to fully benefit from the potential value created, MAIRE is committed to operating in full respect of human rights, promoting relationships based on transparency and mutual respect for their respective cultures, as set out below:

- **Respect for the rights of local communities and their involvement:** MAIRE recognizes the central role of communities in the territories in which it operates. The Group's approach is based on respect for people's fundamental rights, the protection of cultural diversity and the promotion of social inclusion. The Group is committed to acting in compliance with local traditions and practices, establishing a continuous dialogue with the stakeholders of the territories involved. Community involvement is promoted throughout the life cycle of projects
- **Promotion of local development:** Maire is committed to creating job and training opportunities for people in the areas in which it operates, encouraging collaboration with local suppliers and partners
- **Corporate Social Responsibility Programs:** MAIRE promotes initiatives to support the education of local communities and support for the most vulnerable social groups, favoring projects that combine positive social and environmental impacts.

- **Implementation of reporting channels:** The Group has implemented reporting channels to ensure transparency and the involvement of all stakeholders as fundamental elements of its governance

4 TRANSPARENCY AND REPORTING MECHANISMS

Stakeholders who become aware of any violation of the principles set out in this Policy are invited by the Group to make a report.

These reports can be made - even anonymously - through the following channels:

- Whistleblowing platform, available at: [MAIRE Group - Whistleblowing](#);
- Form SA 8000, available at the link [Human Rights and Social Accountability | MAIRE](#);
- Ordinary mail: MAIRE S.p.A., Group Corporate Affairs, Governance, Ethics & Compliance Department, Via Gaetano De Castillia 6/A, 20124, Milan, (Italy).

Reports are managed as required by the Group's "Whistleblowing" Procedure and by the Social Accountability 8000 management system for certified MAIRE group companies.

Any form of direct or indirect retaliation, discrimination or penalization is prohibited against those who have made a report, for reasons linked, directly or indirectly, to the report itself.

5 REFERENCES

This Policy is based on internationally recognised principles and standards and is integrated with the policies and regulatory instruments adopted by the Group.

In particular, the Policy is inspired by:

- United Nations International Bill of Human Rights
- United Nations Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises
- Ten Principles of the United Nations Global Compact
- Social Accountability 8000 Standard

This Policy is supplemented by the following Group strategic documents:

- Code of Ethics
- Sustainability Policy
- Supplier Code of Conduct
- Supply Chain Policy
- Human Resources Policy
- HSE&SA Policy
- Diversity, Equity and Inclusion Policy
- Politica Anti-Harassment
- Whistleblowing procedure

In addition, this Policy contributes to the implementation of the management systems to support the sustainability reporting required by Directive (EU) 2022/2464 (CSRD) and the commitments provided for by Directive (EU) 2024/1760 (CSDDD).